

**WATERSWALLOWS ENERGY LIMITED**

**PLANNING APPLICATION FOR THE**

**CONSTRUCTION OF A 14MW**

**FLEXIBLE ELECTRICITY GENERATION UNIT**

**FOR SHORT TERM**

**OPERATIONAL RESERVE (STOR) CAPACITY AT**

**WATERSWALLOWS ROAD, BUXTON**

**AUGUST 2014**

## 1. Executive Summary

This application is for the development on 0.15 hectares of land within an established operational industrial area at Waterswallows near Buxton of a 14mw Flexible Electricity Generation unit for Short Term Operational Reserve capacity (STOR).

Such development forms part of the UK's essential energy generation strategy for the management of the shortfall in energy generation capacity predicted to arise within the next 2 years and persist for the foreseeable future at least until new large scale generating capacity and complementary renewable sources can be developed and brought on stream.

STOR type developments are small scale local generation facilities based on conventional fossil fuel (diesel) which can be brought on stream within 2 minutes as and when called upon by the National Grid to meet short term local peak demand period deficits in generation capacity.

They are supported by the Department for Energy and Climate Change and National Grid as a necessary part of the response to the imminent energy capacity crisis facing the UK and the inflexibility of large scale generation facilities and renewable energy sources to respond to short term variations in energy demand.

The proposed site has been chosen as the applicants believe it meets the location criteria required to ensure its sustainable operation. This includes its close proximity to an existing electricity substation with the required capacity. Very few such sites exist within the High Peak area.

The equipment involved is sited within an established industrial area and has been designed to best practice in terms of scale and environmental performance. The facility as a whole is discretely sited with minimal environmental impact, both in terms of visual, traffic and amenity considerations.

Recent Government Planning Policy and Guidance emphasises the need for the planning process to acknowledge and support the need to build and sustain the national and local economy and to this end has reiterated the presumption in favour of development wherever it is sustainable and accords with Development Plan policy.

The proposals are largely compliant with the general thrust of such policy. The possible exception is the local policy relating to industrial development in the "open countryside", although it can be argued that the development could be considered an "appropriate" exception.

As part of the UK's essential energy generation strategy, and bearing in mind its potential value to the local economy in contributing to the security of energy supplies to the Buxton economy throughout the crisis period, the existing and historical industrial use of the land and the care taken by the applicant in the design and treatment of the proposals themselves, the applicant believes that it would be consistent with Government Guidance and local Development Plan policy for the application to be granted.

## 2. The Application

This planning application by Waterswallows Energy Ltd (WEL) is for the construction of a “Flexible Electricity Generation” unit for Short Term Operational Reserve (STOR) capacity on disused industrial land adjacent to Waterswallows Road in Buxton.

It is supported by this Statement, a Heritage Statement and Noise Assessment report and the following Drawings:

Dwg No WE01: Location (Aerial) NTS  
Dwg No WE02: Application Area 1:500  
Dwg No WE03: General Arrangement 1: 500  
Dwg No WE04: Viewpoint A 1:100 (@A2)  
Dwg No WE05: Viewpoint B 1:200 (@A2)  
Dwg No WE06: Section C-C’ 1:200  
Dwg No WE07: Switchgear Container elevation NTS  
Dwg No WE08: Generator detail NTS  
Dwg No WE09: Transformer container NTS  
Dwg No WE10: Metering Substation 1:100 (@A3)  
Dwg No WE11: Palisade fencing and gate detail NTS  
Dwg No WE12: Acoustic fence and gate detail NTS  
Dwg No WE13: Fuel Tank detail NTS

A pre-application meeting was held with planning officers of the Authority on 13 August 2014 and written feedback provided which has been taken into account in the preparation of this application. This feedback indicated that, at less than 0.5 ha in size, the development falls outside the provisions of Schedule 2 of the Town and Country Planning (Environmental Impact) Regulations 2011 and therefore does not constitute EIA development.

## 3. Background

In the last 12 months the UK Government has become increasingly aware of the continual falling power generating capacity in the United Kingdom. In response to this situation, the Department for Energy and Climate Change (DECC) has been in detailed consultation with the UK Power Generators and a new methodology of addressing this decreasing capacity has been initiated. This methodology is called the ‘Capacity Market’. The ‘Capacity Market’ is in addition to other initiatives including STOR.

Both the Capacity Market and STOR are initiatives being operated by National Grid (NG) to enable it to meet its Balancing Supply and Demand (BDAS) obligations under its Transmission Licence (issued by DECC) to ensure a balance between electricity supply and demand.

At certain times of day, NG needs power in the form of either generation or demand reduction to be able to deal with actual demand being greater than forecast demand, and plant breakdowns.

The STOR scheme is a vital component in enabling such fluctuations in demand to be met promptly and efficiently (a feature which large inflexible power generating facilities and intermittent sources such as wind power cannot provide). However, it is also part of a wider industry strategy, supported by Government via their “Capacity Market” initiative. The UK has an acknowledged electrical energy deficit for the next 10 years – this is a result of both Waterswallows Energy Ltd – STOR facility, Waterswallows, Buxton

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rising demand combined with the loss of over 20% loss of existing generating capacity. One key reason for this loss of generating capacity has been the implementation of the Large Combustion Plant Directive (LCPD, 2001/80/EC) which has resulted in the closure of a significant number of coal and oil fueled electrical generation power stations in a bid to reduce emissions of sulphur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) and dust (particulate matter (PM)) from large combustion plants (LCPs) such as power stations, petroleum refineries etc.

A press release issued by the DECC on 23 November 2012 stated that “a Capacity Market will provide an insurance policy for Government against future supply shortages, helping to ensure that consumers continue to receive reliable electricity supplies at an affordable cost. Despite the increase in STOR capability across the UK, the UK Government has recognised that more needs to be done to provide the additional generating capacity which is now needed”.

In its June 2014 ‘National Grid EMR<sup>1</sup> Electricity Capacity Report’ National Grid stated: *‘Due to plant closures and the need to replace and upgrade the UK’s electricity infrastructure, the UK electricity sector will require significant capital investment over the next decade. The Government’s EMR programme provides an ambitious package of measures to incentivise the investment needed to replace the ageing infrastructure.’*

Waterswallows Energy Ltd has completed an option to take a lease of the site subject to the grant of planning permission and proposes to enter the full Capacity Market tendering procedure which will be formally initiated in December 2014.

The Waterswallows Energy Ltd infrastructure is small-scale generation and of necessity is local in nature. The operating principle is that NG can call upon the capacity at short notice (2 minutes) to feed power into the grid for such, generally limited, period as it is required. To facilitate this efficiently and viably, this requires the installation to be close to a main substation in order to access the grid which restricts the number of locations where it can economically be located. Such a substation is located within 500m of the site fronting Waterswallows Road.

STOR installations are flexible units (they can be brought on line within 2 minutes), smaller, much quicker to build (6 months as opposed to 5-10 years) and more economic than conventional large fossil fuel or nuclear power stations. Being distributed throughout the country, small scale and close to the point of use, they are unobtrusive and require minimum additional infrastructure such as pylons and sub-stations. This is a particular advantage in the sensitive areas such as the Derbyshire High Peak.

To minimise the intrusion of flexible generation plants, it is necessary to avoid the need to build or reinforce pylons, transformers or other new infrastructure and equipment. They therefore need to be located close to existing substations with capacity for the import of electricity as well as its distribution from the upstream grid. There are relatively few such locations in the country.

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<sup>1</sup> Electricity Market Reform

WEL's owners have researched the existence of such locations in the High Peak area, and found none which had sufficient capability of this nature combined with the availability of proximate or practical development land.

In terms of the scale of generation, the owners also consider that the time taken to secure approvals from all the necessary authorities, including the Infrastructure Planning Commission (IPC) for STOR facilities larger than those proposed for WEL would be too long<sup>2</sup>. By the time such plants could be approved and built, the capacity crisis would be upon us. The owners therefore believe that the scale of the proposed development is the optimum one designed to meet the urgency of the situation and that the site at Waterswallows is particularly suitable in the High Peak area.

Whilst the units use fossil fuels, the amounts are relative small, and, by being so flexible in their response time, their existence improves the case for large but intermittent generators such as offshore wind. In doing so, they provide an indirect contribution to the UK's carbon reduction plan.

The facility proposed by WEL at the Waterswallows Road site therefore would form part of the UK's overall power transmission network. As such it is deemed Essential Infrastructure and the applicant believes it should be considered as such in planning terms.

However, as well as supporting the national electricity supply system, WEL would also provide additional security of electricity supply to the domestic and industrial consumers in the Buxton and High Peaks area. In particular, the point of connection to the National Grid infrastructure provides the potential for the power generated to be sent direct to one of the largest electricity consumers in the High Peak, Lafarge Tarmac's premises at Tunstead Quarry, thus directly relieving the pressure on the grid to supply the town of Buxton and surrounding communities. There is therefore a local aspect to the need for the facility.

#### **4. Site location and history**

Dwg No WE01 identifies the Site which is located approximately 2 km east of the centre of the town of Buxton in an established industrial area known as Waterswallows. It also shows that the application area lies immediately adjacent to the manifestly brown-field site of the now exhausted and unrestored Waterswallows quarry. The site is currently used as a haulage yard associated with a major haulage contractor in the Buxton and High Peak area, having until recently been used as a waste transfer depot.

Immediately opposite the site is the Waterswallows Industrial Estate (formally part of the quarry), adjacent to which Nestle has recently relocated its Buxton Water bottling plant from its site within the Buxton urban area.

Dwg No WE02 shows that the application site area and the above industrial estate are linked directly to the A6 via Waterswallows Lane, which has been upgraded to carry the extensive HGV traffic visiting the Tunstead Quarry complex lying c 1.0km to the east.

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<sup>2</sup> Installations with an input capacity of more than 50mw (equating to 20mw output) require additional permitting procedures to be completed

The proposed site is set back from Waterswallows Lane to and from which it will gain access. It is c 0.15 hectares, broadly rectangular in shape and is bounded on the west by the above mentioned haulage yard. To the north is Waterswallows Lane and to the east and south lies the now disused Waterswallows Quarry.

The land is sited at the base of a c 3 metre high embankment which screens it from the south and east. It is well screened from the west by existing development and from the north, it lies behind a grassed roadside bund surmounted by well-established ash and other deciduous trees.

## 5. Planning History

The site forms part of an area that has been and remains in industrial use for many years, principally as a haulage/garage facility, initially associated with the operation of Waterswallows Quarry (which ceased operations in the late 1980s) and over the subsequent years as a private haulage concern.

In 1991, 1993 and 1995, permissions were granted by the Derbyshire County Council for use of part of the above site (and part of the application area) as a waste transfer station (HPK/890/029807, CW1/1293/104 and CW1/195/85). The 1991 application Committee report noted that *"The site, off Waterswallows Road, is within an established road haulage/builder's yard which has been operated by the applicants for a number of years."* In 2008, outline consent for Mixed Use General Industrial Storage and Distribution was granted by High Peak Borough Council on land which encompasses the application area (HPK/2008/0529). The Committee Report noted that, whilst the land was *"not on a designated site and therefore in policy terms is in "Open Country", it is in existing industrial use and adjacent to an existing industrial estate"*.

On 13 February 2014, permission was granted for the development of a similar STOR facility on 0.3 ha of land some 100 metres west of the application area (HPK/2013/0627). This involved a 16 megawatt (MW) capacity installation of 8 generators of the same type, delivering electricity to the same substation. This permission is expected to be implemented in 2015.

## 6. Development description

Dwg No WE3 contains details of the general arrangement of the development. This will comprise the levelling of the site to accommodate 7 x 2MW diesel powered generators (each within its own acoustic container and mounted on individual concrete rafts), 4x 4MVA 33/11kV transformers (TX1-4), and 2 x 40,000ltr fully bunded fuel tanks (TF 1 and 2), 1 high voltage electrical switchgear container and a pitched roof metering substation constructed in brick and textured GRP. The site would be security fenced and gated.

Electrical cabling to the grid connection point immediately outside the site (in Waterswallows Lane) will be laid underground from the on-site metering substation. A 4m wide sealed surface will be constructed along the northern and western sides of the installation to facilitate the access and parking of visiting vehicles.

The site as a whole (excluding the above surfaced access ways) will be secured and gated by a 2.4m steel palisade perimeter fence. A 4 metre high acoustic fence will be erected inside the palisade fence along the northern and western boundaries.

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Access to the site from the public highway will be through the haulage yard, utilising the existing entrance at the junction of Waterswallows Lane and Waterswallows Road approximately 100 metres to the west. It will thus share the same access point with the 2014 permitted STOR development.

Other than traffic associated with its construction, vehicle movements will be confined to periodic fuel deliveries (the number would depend on the usage of the facility by National Grid but will be unlikely to exceed 50 movements per annum) and routine maintenance visits.

Current estimates are that the facility will be utilised for c 150 hours per year, of 1-2 hour duration generally during periods of morning and/or evening peak demand.

The site will not be manned. It will be managed/supervised by the landlord from his premises in Waterswallows Industrial Estates immediately opposite and adjacent. The site is already a semi hard compacted surface and as such, the development will not generate any increased level of run-off.

Dwg Nos WE07-13 provide elevational and technical details of the various plant elements within the site – the proposed Switchgear Container, Generator unit, Transformer container, Metering Substation, Palisade fencing and gate, Acoustic fence and Fuel Tanks.

## **7. Environmental Impact**

### **7.1 Visual and Landscape:**

The area around Waterswallows is described in the Derbyshire Landscape Character Assessment as Plateau Pastures. The proposed site itself, being industrial in character, displays no features associated with this designation, nor will its proposed use have any impact, visually, functionally or in biodiversity terms, on the integrity of the landscape character of this part of the County.

Dwg Nos WE 4, 5 and 6 illustrate the likely appearance of the installation from various points outside the site.

Overall, visibility of the site is minimal from every direction. In any event, it lies within an established matrix of haulage and industrial related activities and will not therefore be prominent or out of keeping with the immediate area.

### **7.2 Noise:**

Great care has been taken to establish the potential of the proposed development to impact adversely on existing sensitive receptors. Two such receptors have been identified as the residential property of Breezemount Farm c 80metres to the northwest and Lock Iron Cottages some 320metres to the southwest.

A detailed noise report has been commissioned to assess not only the impact of the proposed development on these properties but also the cumulative impact of both the proposed development and that permitted in 2014 (the 2014 development). This Report is attached to the application as an Appendix . It concludes that, provided a 4 m high acoustic

fence is in place in the position shown on WE03, the specification<sup>3</sup> of the generator sets that will be used is such that noise levels experienced at the receptors when both the 2014 development and the proposed development are on-line together will not exceed 38dBA during either the day or the night.

#### 7.3 Traffic:

The access to and from the site onto the Waterswallows Lane/Road junction has been used by HGVs and light vehicles for many years without incident. Visibility in all three directions is good and traffic speeds are low as vehicles approach the bend and the junction.

Other than traffic associated with its construction, vehicle movements will be confined to periodic fuel deliveries (the number will depend on the usage by National Grid of the facility but will be unlikely to exceed 50 movements per annum) and routine maintenance visits.

Derbyshire County Council Highways Dept has been consulted as regards the acceptability of this proposal and has indicated that, based on the projected level of traffic visiting the site, even allowing for the impact of the development with that of the as yet unimplemented 2014 development, this represents a negligible incremental addition to the existing level of HGV traffic on Waterswallows Lane associated with the Tunstead Quarry complex and the Waterswallows Industrial Estate. Accordingly, it has stated that *“it is unlikely that this Authority would raise objections should a formal planning application be submitted”*.

#### 7.4 Flooding and drainage:

The site area is below the threshold identified in the National Planning Policy Framework Technical Guidance Note for the preparation of a Flood Risk Assessment. The site is already heavily compacted and the volume of run-off from the site following development will not increase significantly.

#### 7.5 Ecology:

The site is hard surfaced and has been regularly trafficked for many years. However, a Phase 1 ecological desk study and walk over survey of the area which was carried out in 2013 with reference to the 2014 permission area, has been updated to cover both the site and the land surrounding within a radius of 250 metres.

It has concluded that *“there are not considered to be any ecological constraints to development of the site”*.

The Report is submitted as an Appendix to this application.

#### 7.6 Lighting:

The site will not be lit during the hours of darkness other than in automated response to unauthorised intrusion or to carry out emergency repairs when additional ad hoc lighting may be brought on site.

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<sup>3</sup> The generator set design has been modified to reduce the noise output level to a value well below the output of conventionally designed units. The principal change has been to increase the size of the exhaust silencer box and mount it on the ground: see WE08



### 7.7 Heritage:

A Heritage Statement has been prepared and is submitted as an Appendix to this application. It concludes that the long term industrial use of the site and the associated surface disturbance and compaction is such that the potential archaeological interest of the site either in itself or in association with either of the two Monuments identified in the vicinity is extremely remote and does not justify any further action.

## 8. Planning Policy context

The principal policy guidance and context is provided via the National Planning Policy Framework (NPPF) document issued by the Government in March 2012 and the 2005 High Peak Local Plan (Saved Policies). The latter is in the course of review via the Draft Local Plan for which the Final Draft Consultation process has recently closed.

### 8.1 The NPPF:

This reaffirms the established principle of the presumption in favour of development unless material considerations suggest otherwise<sup>4</sup>. In the context of such development being sustainable, it goes on to stress the importance of the planning system providing support through Development Plans for developments which contribute to the growth and sustainability of a strong economy by providing land in the right place for various types of development, including the provision of infrastructure<sup>5</sup>. It requires Local Planning Authorities to support development which meets the needs of business and the economy<sup>6</sup> and encourages the use of brown in preference to green field land<sup>7</sup>.

In terms of energy related development, the emphasis is on providing positive support for alternative and renewable sources rather than the use of hydrocarbons. However, it is acknowledged within the National Policy Statement for Energy Infrastructure (NPSfEI) that the future provision of energy to the UK will continue to be based in large part on hydrocarbons (and nuclear) for the foreseeable future. It is clear from DECC initiatives, of which STOR is one, that the importance of providing flexible generation capacity is accepted. STOR facilities are a small but vital element of an integrated matrix of generation capacity types, particularly in relation to bridging the predicted capacity shortfall gap.

Local Planning Authorities are also encouraged to identify strategic priorities which, inter alia, deliver the provision of infrastructure for energy<sup>8</sup>.

### 8.2 The High Peak Local Plan 2005 (Saved Policies):

The saved policies are broadly consistent with the NPPF guidance, in particular seeking to guide development towards underused or derelict "brownfield" land<sup>9</sup>. General Policies (GD 4-6) deal with minimisation of impact on the local area by the use of careful design and the

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<sup>4</sup> Paras 11 and 14

<sup>5</sup> Para 7

<sup>6</sup> Paras 19, 20 and 21

<sup>7</sup> Paras 17 and 111

<sup>8</sup> Para 156

<sup>9</sup> Para 2.28

avoidance of impact on general amenity. The proposals have been designed with these policies in mind.

The apparent designation of the site as “Open Countryside” (OC), for which the policy context set out in Chapter 3 is relatively restrictive, is anomalous with its character and the long established industrial nature of both its own and that of the adjacent and surrounding land uses. However, development in the “open countryside” which is considered “appropriate” will attract a presumption in favour of approval, and reference is made to such types of development including those “which can only take place where the resource is available”<sup>10</sup>. The close proximity of a substation referred to in Para 3 hereof is a key factor in this context.

In addition, the applicant believes that the development is compliant with the provisions of Paras 3.4, 3.5 and 3.7 which encourage the re-use of derelict, despoiled or disused land (Para 3.4), is sympathetically integrated into the landscape (Para 3.5) and, as the site does not fall within either the Green Belt or the Special Landscape Area, the probability that the site should be classed as “white land” (Para 3.7)<sup>11</sup>.

The development is also compliant with Policy 9/OC 1 in that it is not at variance with the criteria set out therein: viz not detracting from the open character of the countryside, not generating significant traffic or people movements and not adversely impacting on the character or distinctiveness of the countryside.

The site is not “conspicuous from the Peak District National Park” and therefore is not at variance with Policy 13/OC5.

Policy 15/OC8 requires that the SSSI within Waterswallows Quarry should be protected from any development which may be harmful to it. Discussions with Natural England has confirmed that, being at least 50 metres from the boundary of the SSSI, the proposed development and use) is unlikely to have any adverse impact on this feature, which is solely designated for the nature of its geological exposure.

Overall, the circumstances associated with the application area are such that the applicant believes that the proposal can be accommodated within the constraints of the OC suite of policies.

Chapter 7 dealing with Employment and Business is prefaced by an implicit acknowledgment that the plethora of recent and ongoing major developments in Buxton will create further pressure for the provision or extension of energy infrastructure and security. This theme is picked up again in the Final Draft Local Plan document. However, whilst there are frequent references in both documents to one of the principal aims of the Local Plan to encourage the growth and diversification of the local economy, there is no general policy acknowledgment within either document to the need to support the energy related infrastructure development needed to achieve this by providing support for appropriate development. Specific criteria based policies relating to renewables, (notably wind) are not relevant to this application.

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<sup>10</sup> Para 3.3/Policy OC1

<sup>11</sup> This designation carries a presumption that the land will remain in its existing use.

Policies 56/EMP 4 and 57/EMP5 seek to restrict such development to Primary Employment Zones (PEZ) or to established industrial sites. The proposed site lies within 30m of the Waterswallows PEZ and forms part of what is still an established industrial site. It also complies with the qualifying wording of Policy 57/EMP5 which requires that it should “not materially impact its neighbours” and that it should be “substantially screened in a sympathetic manner”.

Precedent for its development for industrial purposes is also well established – see Para 5 hereof.

The proposed development also complies with Policy 59/EMP 7 (which deals with applications for open storage and processing outside PEZs) which requires buildings associated with employment development in the countryside to be both “essential and appropriately sited and designed” and “have adequate site access and not increase traffic significantly”.

With regard to Transport policy, the development will generate a very low level of journeys, well below anything that could be construed as material in the context of policy. Highway safety and the impact of traffic on local amenity generated by the predicted number of movements are likewise not considered to be material in policy terms.

### 8.3 The Draft Local Plan:

The final draft of the replacement Local Plan completed its consultation stage in June this year. Whilst it is well advanced in the overall Plan-making process, it is still of restricted weight in terms of its status as part of the Development Plan given that many policies are still the subject of objections.

However, its principal aims are by and large not under challenge. They include the need to encourage the diversification and growth of the local economy by making land available for sustainable development. It is axiomatic that this aim can only be realised if land is made available for, inter alia, the energy related infrastructure required to support the new development.

The role of STOR generation, and its use of fossil fuel, in the Government’s and National Grid’s campaign to ensure the impending forecast shortfall in electricity generating capacity in the UK is made good, place the application firmly in the category of strategically important development which planning authorities are required to support in both the public and the national and local interest provided there are no overriding environmental concerns.

Para 4.4 acknowledges that the Council’s policies should seek opportunities to meet development needs with sufficient flexibility to adapt to rapid change. The impending crisis in energy generation capacity constitutes just such a “rapid change”.

Policy CF3 indicates that the Council will work with service and infrastructure providers to ensure delivery of adequate infrastructure services to meet the development needs of the Plan area.

The approval of the application would be a positive step towards meeting this challenge.

## APPENDIX 1 – TECHNICAL REVIEW

### 1. The Facility

The generation facility comprises the following equipment packages:

- 7 Containerised diesel generator sets rated at 2MW each;
- 2 double skinned bunded oil storage tanks;
- 4 electrical power transformers;
- 1 Containerised Switchgear and control facility;
- 1 Distribution Network Owner Interface kiosk (Metering Substation).

The proposal is for a series of small generators, each in its own soundproof container. These generators will operate on diesel fuel, as mains natural gas is not available in the area.

The technology proposed is the Best Available Technology (BAT) for the purpose of rapid start standby generation and being connected to the network at the point of use offers demonstrable efficiency improvements of 20% to 33% over non distributed current standby generation.

The proposed fuel will be stored in double bunded tanks that are located as shown on the site plan. In addition there will be smaller double-skinned day tanks within the container of each generator.

The fuel is held within the bulk tanks and the individual integral generator base tanks. Bulk storage comprises 2x40,000 litre steel bunded fuel tanks feeding into a 50mm steel screwed manifold pipe running in a duct around that area of the site occupied by the generators. The bulk fuel tank is Environment Agency approved, of steel construction with integral bund and come with lockable fuel fill cabinet with standard 2" fuel filling connection suitable for fuel delivery by bulk fuel road tanker. The fill point comes with a tank contents gauge and overfill alarm to prevent inadvertent overfill by a delivery driver.

Individual generator fuel tanks are fully bunded steel construction to Environment Agency approved design.

As described above the generators are in their individual soundproof containers designed by the generator manufacturer's acoustic engineers. Within the generation site compound the generators themselves are mounted on anti-vibration skids that ensure that there is no sound transmission through the ground. The units' silencers and exhaust outlets will be mounted on the ground to reduce the propagation of noise

As with other installations of the type proposed by WEL, the site will be unmanned and operated remotely by National Grid from their offices at Warwick via the WEL head office.

As an unmanned site there is no need for permanent lighting. The only time that lighting is operated is when an engineer is on site in low light conditions and this will be subject to activation by the engineer as he enters the site. The only other lighting on the site is the security lighting and this is only activated on intruder alarm conditions. The lighting is provided to allow the contracted security company to undertake visual inspections under low light conditions. The lighting systems and methodology proposed by WEL avoids

unnecessary light pollution to the immediate and adjacent areas within which the proposed generation facility compound sits.

## 2. Electrical connection

The proposed generation facility is within 500 m of an existing electrical sub-station on Waterswallows Road and it is proposed that the an electrical connection is made to an existing underground power line that runs in the verge on the south side of Waterswallows Lane c 25m from the proposed Metering Substation on site.

The location of the proposed electrical connection and the associated connection activities will not require any road closures of other interference with traffic along Waterswallows Lane.

## 3. Safety

As WEL is supporting the National Grid, the site at Waterswallows will be generating electricity at high voltage and public safety and security is of the highest priority.

The proposed development at will be sited behind 2.4m high metal security fencing with the appropriate signage to adhere to the strict current UK Safety Legislation where the Health and Safety Executive is the custodian of the regulations.

A security company will be appointed to ensure that no unauthorised person enters the site and to ensure community safety is maintained. The security company will monitor the site twenty-four hours a day, seven days a week basis. The security company engaged by WEL to provide security services will have a level of expertise that will meet the requirements of National Grid plc

## 4. Operations:

The principal operational activities at the site will be fuel delivery and periodic visits by mobile engineers and Distribution Network Owner personnel.

The existing site access will facilitate assess and egress to the site. Additionally, parking for the delivery of fuel which is transported in tankers and for the mobile engineers will be provided within the application site.

Fuel deliveries will not involve any obstruction of the public highway.

The tanker will pull off the road and park at the front of the compound for easy access to the tanks on the site – fuel lines to each storage tank will utilise a purpose designed fuel manifold arrangement to allow filling of the individual units. The manifold will be of an all welded construction to avoid potential leaks. This design will ensure that the fuel tanker will not have to physically enter or leave the generation site but will in a forward gear to avoid turning and blocking the existing access.

The tanker delivery arrangements will enable other users to enter the site and follow current arrangements.

The site at Waterswallows will operate autonomously. Delivery of fuel will take place as required (anticipated to be less than once per week) but never out of normal business hours. Business hours are taken as 9am to 6pm Monday to Friday.

#### 5. Construction Activities

The ground works element of the construction phase will take approximately 4 weeks with the electrical installation taking a further 6 weeks. The total construction period will be 10 weeks.

The installation of the generating and ancillary equipment will be undertaken by approved and experienced contractors utilising the necessary construction and installation plant and equipment. A mobile crane will be required to offload the electrical equipment onto pre prepared foundation slabs. It is expected that the equipment offloading process will only take a maximum period of two weeks. This crane will not be required to stand on the highway.