

Planning Statement.

Battery Energy Storage System and associated works on land west of the A6, Upper End, Buxton.

On behalf of Greenergy Renewables UK Ltd.

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Document Management.

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1. Introduction

- 1.1. This statement has been prepared by Pegasus Group on behalf of the applicant, Greenergy Renewables UK Ltd (Greenergy), in support of their planning application for a Battery Energy Storage System and associated works at land west of the A6, Upper End, Buxton.
- 1.2. Following a description of the site, consideration is given to the proposed development. The report assesses the proposal in relation to relevant planning policy and shall demonstrate that the application is in accordance with the Development Plan. This statement draws conclusions as to the suitability of the proposal for the granting of planning permission in the context of the Development Plan and taking into account any material considerations.

Who are Greenergy?

- 1.3. Greenergy is a global Independent Power Producer (IPP) that designs, develops, and operates renewable energy plants on a large scale.
- 1.4. Headquartered in Spain, Greenergy entered the UK market with Greenergy Renewables UK Ltd. in 2020 with the aim of producing clean, sustainable energy to support the Nation's shift to net-zero and protect the environment for future generations.
- 1.5. With operations across Europe, South America and the U.S., Greenergy has 71 installed projects across 11 countries providing 900 MW of power generation, the equivalent of powering around 900,000 UK homes.

Pre-Application Discussions

- 1.6. A request for pre-application advice was submitted to High Peak Borough Council (**PAD2024.0004**). A meeting was held on 30th May 2024 with Rosie Dinnen (Case Officer) and subsequent written advice issued on 24th June 2024.
- 1.7. The formal advice indicated that the principle of a BESS facility was accepted on the site, but that impacts on the surrounding landscape would require sufficient mitigation.

EIA Screening

- 1.8. A request for an EIA Screening Direction was submitted to High Peak Borough Council (ref: **HPK/2024/0356**). A screening decision was issued on 27th September 2024, which indicated the proposed development is not deemed as requiring an Environmental Statement.

2. Site Description and Context

- 2.1. The site is located to the west of the A6 (Buxton Road). The existing rail network runs beyond the western boundary of the site and an existing commercial site abuts the site to the south.
- 2.2. The site is approximately 1.5 hectares in area, consisting of pastoral agricultural use.
- 2.3. The site itself is not identified as being located within a local, regional or nationally designated area for ecology or landscape. The site is also not allocated for any purpose under the extant Local Plan.
- 2.4. The Peak District National Park is located approximately 1.3km west of the site.
- 2.5. The site is located in an area identified as within Flood Zone 1 and is therefore understood to be at the lowest risk of flooding.
- 2.6. There are no designated heritage assets within or immediately adjacent to the site.
- 2.7. The Natural England Agricultural Land Classification Map has identified the land as having potential of being Grade 4 agricultural land. A detailed site survey has also been conducted which concluded the whole site should be classified as ALC Grade 5.

Renewable Energy Context

- 2.8. In light of the drive toward net zero, combatting climate change and electrifying the economy, there is a clear need for the deployment of renewable energy technologies, which is driven by a plethora of government legislation at both a local and national level in the UK.
- 2.9. High Peak Borough Council declared a climate emergency on 15th October 2019. This declaration committed the Council to become carbon neutral by 2030, and to work with partners to achieve this target for the Borough as a whole.
- 2.10. Recent national political shifts have further highlighted the nation's interest in renewable development with the newly elected government pushing heavily towards bringing net-zero targets forward. A recent example of this includes incentives to increase onshore wind, by lifting the de facto ban within the NPPF.

3. The Proposed Development

- 3.1. The proposed development seeks to deliver a Battery Energy Storage development and associated infrastructure to provide balancing services to the National Grid.
- 3.2. This type of facility operates by taking electricity from the Grid at times of low demand, storing it in batteries, and releasing it back to the Grid when demand is high.
- 3.3. Energy storage facilities therefore improve the efficiency of existing energy production facilities, notably from renewables where production is intermittent and based on external conditions. BESS plants also provide key stability services to the grid network through Dynamic Frequency Response where the plant can quickly react to network conditions to manage the electricity frequency as generation and demand loads shift.
- 3.4. The forthcoming planning application will provide full details of the proposed development.
- 3.5. The proposed development will consist of modular containerised Battery Energy Storage Systems (BESS) set on concrete pads, with typical BESS dimensions of approx. 2.4m (width) x 6m (length) x 2.6m (height). Other equipment required to support the development is likely to include:
 - Switchgear building;
 - Monitoring/welfare office;
 - DNO Substation/building;
 - Power station (inverters and transformer units);
 - CCTV cameras;
 - Motion sensor lighting;
 - Security and acoustic fencing;
 - Fire security (including provision of fire hydrants);
 - Parking spaces and internal access roads.
- 3.6. Access to the site will be obtained via an existing entrance from the A6 (Buxton Road) to the eastern boundary of the site.

End of Life Decommissioning

- 3.7. Battery Energy Storage Systems can be easily and economically decommissioned and removed from the site at the end of their life (35 years) with the site returned to its original form, in this instance: pastoral agricultural land. Decommissioning is anticipated to take approximately 6 months.
- 3.8. Once the site is fully decommissioned, the site will be restored to its former use and all built infrastructure will be removed.

3.9. There are several aspects involved with the decommissioning phase. The main activities comprise:

- Removal of inverters and battery storage units with cranes to be recycled or repurposed. The prefabricated concrete slab upon which they are supported can be lifted or broken up and removed;
- Removal or making safe of cable and ancillary structures;
- Removal of fencing and any ancillary associated equipment.

4. Planning Policy Context

Legislative Background

- 4.1. This chapter summarises the planning policy and guidance relevant to the development proposed.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 required that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is a key material consideration in the determination of planning applications and also sets out the framework of policies with which up-to-date development plans must be in accordance.

Development Plan

- 4.3. For the purposes of Section 38(6), the adopted Development Plan for the district is the High Peak Local Plan, adopted in April 2016.

High Peak Local Plan

- 4.4. The policies relevant to this application are as follows:
- Policy S1: Sustainable Development Principles;
 - Policy S1a: Presumption in Favour of Sustainable Development;
 - Policy S2: Settlement Hierarchy;
 - Policy S7: Buxton Sub-area Strategy;
 - Policy EQ1: Climate Change;
 - Policy EQ2: Landscape Character;
 - Policy EQ3: Rural Development;
 - Policy EQ5: Biodiversity;
 - Policy EQ6: Design and Place Making;
 - Policy EQ9: Trees, Woodlands and Hedgerows;
 - Policy EQ10: Pollution Control and Unstable Land;
 - Policy EQ11: Flood Risk Management;
 - Policy CF3: Local Infrastructure Provision;
 - Policy CF6: Accessibility and Transport.

- 4.5. It is acknowledged that High Peak Borough Council are undertaking a review of their adopted Local Plan. According to the Local Development Framework (2022), the Council anticipate that any updates to the High Peak Local Plan will be adopted in 2026. At present, the emerging Local Plan Review bears little weight in the decision making process.

Supplementary Planning Documents (SPD)

- 4.6. The following SPDs are deemed relevant to the proposed development:

- High Peak Design Guide SPD 2018;
- Landscape Character SPD 2006.

Neighbourhood Plans

- 4.7. There is no neighbourhood plan in place for this area, or either of the neighbouring towns.

National Policy Considerations

National Planning Policy Framework (NPPF)

- 4.8. The National Planning Policy Framework (NPPF) was last updated in December 2023. The Applicant acknowledges that due to the recent change in Government, it is anticipated that a revised NPPF will be issued in due course. A rapid change in energy policy has already been demonstrated by the recent Policy Statement on Onshore Wind, which was published 8th July 2024¹.
- 4.9. 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:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - 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.

¹ <https://www.gov.uk/government/publications/policy-statement-on-onshore-wind/policy-statement-on-onshore-wind>

- 4.10. Paragraph 157 of the NPPF states that the planning system should support transition to a low carbon future in a changing climate and should support renewable and low carbon energy and associated infrastructure.
- 4.11. Paragraph 159 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 the planning of green infrastructure; 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.
- 4.12. Paragraph 162 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.
- 4.13. Paragraph 163 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 recognise that even small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions;
 - b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas; and
- 4.14. Best and most versatile land is defined within the glossary of the NPPF as "Land in grades 1, 2 and 3a of the Agricultural Land Classification."
- 4.15. Paragraph 208 states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- Emerging National Planning Policy
- 4.16. On 30th July 2024, an amended consultation version of the NPPF was published. It is acknowledged that this version of the NPPF is still to be consulted on, however some weight can be applied to the document given it indicates the direction of travel for planning policy.

- 4.17. The most recent version of the NPPF stated that the ‘planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure’. This remains unchanged.
- 4.18. Paragraph 163 now requires that LPAs should ‘also’ give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic.
- 4.19. Proposed Paragraph 164 now additionally states that ‘local planning authorities should support planning applications for all forms of renewable and low carbon development’. The remainder of the paragraph retains the principle that applicants are not required to demonstrate the overall need for renewable or low carbon energy; and LPAs should ‘give **significant weight** to the proposal’s contribution to renewable energy generation and a net zero future’. [Our emphasis].
- 4.20. Finally, the proposed NPPF has also removed (from footnote 64) ‘*the availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development*’.

Renewable Energy – Policy and Guidance

Planning Practice Guidance (PPG) (first published March 2014)

- 4.21. The Government’s web based PPG went live on 6th March 2014 and contains guidance on the planning system and has been subject to updating periodically. The web-based guidance should be read alongside the NPPF and is a material consideration in the consideration of planning applications.
- 4.22. Within the PPG, there is a section on **Renewable and Low Carbon Energy** (last updated 14th August 2023).
- 4.23. This section of the PPG notes that Battery Energy Storage Systems enable us to use energy more flexibly and de-carbonise our energy system cost-effectively. Paragraph 034 states that where planning permission is being sought for development of Battery Energy Storage Systems of 1MWh or over, applicants are encouraged to engage with the relevant fire and rescue service during the process of the planning application.

Transitioning to a Net Zero Energy System: Smart Systems and Flexibility Plan 2021

- 4.24. The Department for Business, Energy and Industrial Strategy (now Department for Energy Security and Net Zero) along with Ofgem produced the ‘Transitioning to a Net Zero Energy System: Smart Systems and Flexibility Plan 2021’, acknowledging that current flexibility on the electricity grid is primarily from fossil fuel generation. The report states that over the next decade, flexibility on the grid will be required from electricity storage, in particular, lithium-ion battery storage.

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

- 4.25. EN-1 was designated on 17 January 2024 and sets out national policy for energy infrastructure in the UK. Its primary purpose is to be applied to decision for Nationally Significant Infrastructure Projects, which the Proposed Development the subject of this application is not. It is also confirmed this document can be a material consideration in the determination of planning applications, and the extent to which the policies in the NPS are material, and to what extent, will be judged on a case-by-case basis and will depend upon the extent to which the matters are already covered by applicable planning policy.
- 4.26. EN-1 also highlights in several places that demand for electricity is likely to increase and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity.
- 4.27. The consequence of this is that if demand for electricity doubles by 2050, EN-1 states that *'we will need a fourfold increase in low carbon generation....In addition, we committed in the Net Zero Strategy to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, whilst meeting a 40-60% increase in electricity. This means that the majority of new generating capacity needs to be low carbon'.*

UK Battery Strategy (November 2023)

- 4.28. On 26th November 2023, the Department for Business and Trade published the UK Battery Strategy, which details the government's vision to continue the growth of a 'thriving battery innovation ecosystem' within the UK. Ultimately, this document establishes that the Government's 2030 vision is for the UK to have a globally competitive battery supply chain that supports economic prosperity and the net zero transition.

Factsheet on Solar Farms and Agricultural Land (June 2024)

- 4.29. Solar Energy UK published a Factsheet on Solar Farms and Agricultural Land in June 2024 as a tool for Local Planning Authorities to use when making decisions on solar proposals.
- 4.30. While related to solar farms, the factsheet identifies that planning policy seeks to direct renewable energy development away from higher grade agricultural land, however owing to locational constraints of such developments, this is not always possible. The factsheet also highlights that land availability and a viable grid connection are key factors that dictate the location of an energy project.
- 4.31. Most importantly, the factsheet concludes that renewable energy developments ultimately will not impact on the UK's food security, and that:

"In any event is not considered to be a material matter for the planning system".

5. Assessment of Proposed Development

- 5.1. The following section of this report assesses the development proposals against the policies of the Development Plan, the NPPF and NPPG. It is considered that the key issues in the determination of the application are the principle of development, the impact upon landscape, amenity and biodiversity, highways and traffic implications, heritage, noise and flood risk.

General Principle of Development

- 5.2. This application seeks permission for a Battery Energy Storage System and associated works on land west of the A6, Upper End, Buxton.

The National Need for the Proposal

- 5.3. There is a clear need for the development of Battery Energy Storage Systems (BESS), which is driven by numerous government legislation at both a local and national level in the UK.
- 5.4. 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.
- 5.5. Battery Energy Storage enables power generated at periods of low electricity demand, which would otherwise be lost; to be stored and then discharged at a later time when the demand for the power is most needed. This is an essential function to maximise the output of the plant, providing a greater offering of electricity to the network for an extended period of time and reducing wastage.
- 5.6. Battery Energy Storage can also serve the grid networks in other capacities such as providing grid balancing and frequency services which aid the continued integration of renewable development and removal of fossil fuel generation to the network.
- 5.7. The provision of a broad range of energy solutions, including BESS, creates a more robust energy network that is less susceptible to fluctuations in global markets for oil and gas, making the UK energy supply less carbon intensive with greater levels of resilience, security and self-sufficiency.
- 5.8. It is also considered relevant to consider the weight that the Secretary of State and Inspectors have given to the benefit of renewable energy generation in determining recent appeals, which is explored further in Section 6 of this Statement.

Social, Economic and Local Community Benefits

- 5.9. Greenergy 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 at a local level;
 - Supporting the storage and distribution of energy at a local level;
 - Reduction in carbon emissions has a consequential positive effect upon public health, via the reduction in greenhouse gases and associated improvements to air quality at a local level;
 - Economic benefits associated with investment and support of jobs during the construction and operation phase of development. Greenergy will, where possible, source local contractors and supplies for civil engineering works, as well as operational phase maintenance contractors to maintain the proposed landscaping and plant on site; and
 - Appropriate biodiversity and landscape enhancements via increased boundary planting, woodland creation and species-rich grassland.
- 5.10. 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.
- 5.11. 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 Principles

- 5.12. Policy S1 of the High Peak Local Plan establishes the sustainable development principles that shall underpin decision making in the Borough. The policy states:

"The Borough Council will expect that all new development makes a positive contribution towards the sustainability of communities and to protecting, and where possible enhancing, the environment; and mitigating the process of climate change, within the Plan Area. This will be achieved by:

- *Further mitigating the impacts of climate change by seeking reductions in greenhouse gas emissions across the High Peak; in particular through supporting the delivery of renewable and low-carbon forms of energy, where this is considered acceptable against all other Development Plan policies as a whole."*

- 5.13. Policy EQ1 of the High Peak Local Plan sets out how the Borough will aim to address climate change. The policy states:

“The Council will adopt strategies to mitigate and adapt to climate change. In addressing the move to a low carbon future for High Peak, the Council will plan for new development in locations and ways that reduce greenhouse gas emissions and adopt the principles set out in the energy hierarchy.

The Council intends to meet part of its future energy needs through renewable or low carbon energy sources and will therefore encourage and support the provision of renewable and low carbon technologies.”

- 5.14. The formal pre-application advice given by High Peak Borough Council indicated that the principle of providing a BESS facility is justified on the basis of local and national planning policy.

Stakeholder Engagement

- 5.15. Grenergy, along with Engage Agency, have undertaken stakeholder engagement exercises throughout the process of preparing the planning application for the proposed development. The communications and engagement relating to the proposed development included the following:

- Dedicated consultation website;
- Introductory letter to key stakeholders;
- Newsletter mailed to key stakeholders and residential properties in close proximity to the proposed development;
- Briefings for key stakeholders.

- 5.16. A report summarising the stakeholder engagement has been prepared by Engage Agency and supplements this planning application.

Landscape and Visual Amenity

- 5.17. Policy EQ2 of the Local Plan states:

“The Council will seek to protect, enhance and restore the landscape character of the Plan Area for its own intrinsic beauty and for its benefit to the economic, environmental and social well-being of the Plan Area.”

- 5.18. A Landscape and Visual Appraisal has been prepared by Axis in support of this application, along with an Illustrative Landscape Plan, which supplements the results of the Biodiversity Net Gain Assessment.

- 5.19. The Landscape Masterplan proposes increased woodland planting and planting of individual trees, along with an extensive wildflower meadow across the site. Planting along the eastern and western edges of the installed equipment will minimise views to visual receptors, particularly along the A6 (Buxton Road).

- 5.20. The Landscape and Visual Appraisal assesses the effects of the proposed development on landscape features and visual amenity. It is concluded in the LVIA that, in spite of any localised adverse effects due to the Proposed Development, the scheme would be visually contained and landscape and visual effects on the Peak District National Park would be limited due to the proposal's small scale. The proposed tree planting will integrate the Proposed Development into the existing landscape.

Heritage and Archaeology

- 5.21. Policy EQ7 of the Local Plan states:

"The Council will conserve heritage assets in a manner appropriate to their significance. This will take into account the desirability of sustaining their significance and will ensure that development proposals contribute positively to the character of the built and historic environment."

- 5.22. A Heritage Statement has been prepared by Pegasus Group in support of this planning application, which is also supplemented by a Geophysical Survey which was completed by Magnitude.

- 5.23. The Heritage Statement concludes that there are no designated heritage assets recorded within the site or within a 1km study area from the site. No harm is identified to designated heritage assets within the wider surrounds of the Site as a result of the Scheme has been identified.

- 5.24. There is one non-designated heritage asset recorded within the scheme, a north to south running section of the Buxton-Melandra Roman road. The impact of the development has been assessed in light of this non-designated asset and it is concluded that the proposed development is not considered to be constrained by the asset, due to the site layout being designed sensitively so not to impact the agger which will be preserved in situ with a buffer from the development to safeguard the asset.

Agricultural Land

- 5.25. An Agricultural Land Classification Report has been prepared by Oracle Environmental Experts in support of this planning application.

- 5.26. The conclusions of the report detailed that, based on the published data available and the findings of the soil survey, the whole site should be classified as ALC Grade 5. This grading was determined due to the wetness of the site and its topography.

- 5.27. By some distance, the application site does not constitute best and most versatile agricultural land and this weighs positively in the planning balance.

Ecology and Biodiversity

- 5.28. Policy EQ5 of the Local Plan states:

"The biodiversity and geological resources of the Plan Area and its surroundings will be conserved and where possible enhanced by ensuring that development proposals will not result in significant harm to biodiversity and geodiversity interests."

- 5.29. The site itself is not identified as being located within a local, regional or nationally designated area for ecology. The closest SSSIs to the site are the Goyt Valley and Wye Valley SSSIs, approximately 4.2km and 6km from the site respectively.
- 5.30. A Preliminary Ecological Assessment has been prepared by Ellendale Environmental in support of the planning application.
- 5.31. The report concluded that the proposed site is assessed as providing low suitability to support protected species, which has been supported by the results of reptile surveys on site that resulted in no findings of protected species.
- 5.32. Furthermore, a Biodiversity Net Gain Assessment has been prepared by Ellendale Environmental in support of the application. A net gain is proposed on the site, which will constitute a gain of 35.43% for non-linear habitats.

Noise

- 5.33. Policy EQ10 of the Local Plan states:

“The Council will protect people and the environment from unsafe, unhealthy and polluted environments. This will be achieved by:

- *Ensuring developments avoid potential adverse effects and only permitting developments that are deemed (individually or cumulatively) to result in the following types of pollution if any remaining potential adverse effects are mitigated to an acceptable level by other environmental controls or measures included in the proposal...the Council will not permit any proposal that has an adverse effect on a European site:*
 - *Air pollution;*
 - *Pollution of watercourses or groundwater;*
 - *Noise or vibration;*
 - *Light intrusion;*
 - *Land contamination; or*
 - *Other nuisance, environmental pollution or harm to amenity, health or safety.”*

- 5.34. A Noise Assessment has been carried out by 24 Acoustics in support of this planning application. The background noise survey to inform this report was carried out between 24th and 31st July 2024.
- 5.35. The assessment was completed on the assumption that the plant is operating at 100% capacity during the daytime, which would only occur at times of peak demand (i.e worst case assumption- it is not going to operate at these levels at all times). Noise levels are expected to be lower when the plant is not operating at fully duty.

- 5.36. The prediction and assessment within the Noise Assessment include acoustic barriers installed around the east and south of the site. With the inclusion of the acoustic barriers on the site, it is concluded within the Noise Assessment that noise arising from the proposed development would be acceptable at all times.

Hydrology

- 5.37. Policy EQ11 of the Local Plan states:

"The Council will support development proposals that avoid areas of current or future flood risk and which do not increase the risk of flooding elsewhere, where this is viable and compatible with other policies aimed at achieving a sustainable pattern of development."

- 5.38. A Flood Risk Assessment and Surface Water Drainage Strategy has been prepared by Haydn Evans Consulting Ltd. in support of this planning application.

- 5.39. The report highlights that the site falls within Flood Zone 1, and is therefore at the lowest risk of flooding. Notwithstanding this, any surface water generated by the proposed development can be attenuated on site in any extreme events and discharged to ground. The proposals do not increase on or off-site flood risk, meaning the proposed development consequently conforms to Policy EQ11 of the Local Plan.

Highways

- 5.40. Policy CF6 of the Local Plan states that *"the Council will seek to ensure that development can be safely accessed in a sustainable manner."* High Peak Borough Council will seek to support transport infrastructure and services by *"approving developments provided that the capacity and design of the transport network serving the site will reasonably accommodate the anticipated increase in travel without materially harming highway safety of local amenity."*

- 5.41. A Transport Statement has been prepared by Local Transport Projects Ltd. in support of this planning application.

- 5.42. It is concluded within the Transport Statement that the proposed development would not be expected to have a detrimental impact on the highway network in terms of road safety and traffic impact.

Lighting

- 5.43. Policy EQ10 of the Local Plan states that the Council will protect people and the environment from unsafe, unhealthy and polluted environments. Light intrusion is listed as a form of pollution that requires mitigation to ensure that no adverse impacts are experienced.

- 5.44. A Lighting Assessment has been prepared by SHD Lighting Consultancy Ltd. in support of this planning application.

- 5.45. The assessment concluded that compliance with the proposed lighting strategy will ensure that the installed lighting is sensitive towards the wider environment, therefore demonstrating compliance with Policy EQ10.

Fire Safety

- 5.46. Whilst the likelihood of a fire event within a Battery Energy Storage System (BESS) is very small, with only a single recorded event in UK history, fire safety has come to the forefront of attention on BESS due to the presence of lithium-ion batteries within a confined space. There is often a misunderstanding about the safety of BESS sites which are fitted with a number of features to detect and prevent fires including various monitors and sensors for smoke and heat, systems to control battery temperatures and ventilation and gaseous systems to extinguish fires.
- 5.47. The National Fire Chiefs Council has provided guidance to BESS developers about designing and managing sites and as such the applicant has sought to design the site in accordance with this, including multiple points of entry, onsite water supply and appropriate separation distances to prevent the spread of fire in the event of an emergency, as demonstrated in the Fire Strategy Plan.
- 5.48. The applicant has also engaged proactively with the Derbyshire Fire and Rescue Service to explain the design process, safety features and measures to follow in the unlikely event of a fire. A letter from Derbyshire Fire and Rescue Service supplements this planning application and demonstrates that they have no objection to the proposals.
- 5.49. The applicant will continue to engage with the fire and rescue service throughout the development, construction and operation of the plant including the agreement of a Risk Management Plan and an Emergency Response Plan.

6. The Planning Balance

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

- This planning application is in compliance with the Development Plan and national planning policy and guidance. Policy compliance strongly supports planning permission being granted;
- The development and operation of the BESS facility 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 very limited impacts);
- 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.

6.2. 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 not 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 the guidance contained within the NPPF and NPPG.

6.3. The proposed development would provide energy storage capabilities to the National Grid, charging during times of low demand or excess supply, and periodically releasing or discharging at times of high demand.

Need for the Proposed Development

6.4. As explained throughout this Statement, there is an urgent and compelling need for this development and strong policy support for increasing the supply and storage of renewable energy.

6.5. The NPPF says that Local Plans should provide a positive strategy for energy that maximises the potential for suitable development and that plans should consider identifying suitable areas for renewable energy schemes. High Peak Borough Council's Local Plan does not provide for these proactive steps, meaning that it will be necessary for speculative schemes to come forward to meet this need.

6.6. The proposed development will supply energy to the National Grid, comprising secure, distributed and diversified energy generation which fully accords with the Government's policy on energy security.

6.7. Energy security should be regarded as a material consideration in its own right, one which is separate to the generation of renewable energy per se.

6.8. In reviewing Appeal decisions, there is a very clear approach from the Secretary of State and appointed Inspectors in determining schemes relating to Battery Energy Storage System schemes and their contribution to energy security.

6.9. A recent decision made by an Inspector at Lowlands Farm, Halesowen (PINS ref: APP/C4615/W/24/3341383) stated in Paragraph 29:

“EN-1 states that low carbon infrastructure is a critical national policy (CNP). It 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. As a result I give significant weight to these benefits of energy security, flexibility and the contribution to achieving net zero. This is consistent with the draft NPPF which states that for low carbon development, significant weight should be given to the contribution to renewable energy generation and a net zero future.”

6.10. Additionally, at Staythorpe, Newark (APP/B3030/W/23/3334043) the appointed Inspector stated in Paragraph 13:

“Battery storage is an essential part of the system services that will enable the National Grid to handle the change in power flows arising from the growth in power from renewable energy sources and the decommissioning of coal and gas power stations. Without the system services to support zero carbon technologies, stabilising the National Grid will be challenging and will constrain the amount of renewable energy that can be utilised by the grid, ultimately hindering the ability to decommission further coal/gas power plants.”

6.11. Furthermore, in a recent (24th July 20224) appeal decision for a 24MW solar scheme at Honiley, Kenilworth (APP/T3725/V/23/3332671), the Secretary of State made the following assessment of these benefits (paragraph 24):

*“She has taken into account the contribution of the project to meeting the need for renewable energy as set out at IR160–161; the benefits of generating electricity locally as set out at IR162–163; the contribution to reducing dependency on other electricity generating power sources as set out at IR164–165; and the contribution to increasing renewable energy capacity in this area as set out at IR201– 203. She considers that these benefits associated with the provision of renewable energy should collectively carry **substantial weight** (our emphasis).”*

6.12. The equation effectively used by the SoS being:

- Substantial weight (for urgent and current needs for renewable energy to contribute to the nation’s energy and environmental needs))

+

- Significant weight (for generating electricity locally reducing the UK’s reliance on imported energy and hence increasing the UK’s energy security)

+

- Moderate weight (for lowering costs)

=

- Substantial weight

- 6.13. This approach is consistent with that of section 3.3 (notably paras 3.3.57 to 3.3.64) of NPS EN-1 (which can be a material consideration in TCPA applications) that relates to the need for new NSIP scale electricity infrastructure and sets out that the factors outlined above are to be collectively given substantial weight.
- 6.14. It is considered that these proposals can be assessed in the same way, but in the specific context of Battery Energy Storage System deployment. Indeed, as is mentioned above, BESS facilities constitute low-carbon technologies and as such the end result would bring a collective substantial benefit.
- 6.15. This approach accords with the range of information stressing the urgent and significant need for additional low carbon infrastructure set out in this Statement. As set out above, the meaning of significant should not be interpreted as being of less value than substantial or very substantial, they are of equal value and the proposed change to the NPPF on this matter will result in a commonality of language without impacting on the importance/weight of the proposal's contribution to renewable energy generation and a net zero future.
- 6.16. As set out above the collective weight of benefits relating to a net zero future; increased energy security; and a lowering of energy costs have been shown to provide for a collective substantial benefit. This is certainly the case here.
- 6.17. Taking all the above into account, due to the imperative to deliver low carbon infrastructure schemes which can assist in decarbonising the UK's electricity supply, that the benefit of a Battery Energy Storage System connecting into a local grid network should be afforded substantial positive weight in determining this application.

Best Available Technology

- 6.18. The Proposed Development will comprise the latest best available technology. For example, the battery units within the BESS are to be the most efficient available on the market that the applicant can utilise, and with battery advancements rapidly improving year-on-year, it is anticipated that the design will be further refined to a more condensed layout post-consent.
- 6.19. Therefore, the proposed scheme benefits from the utilisation of the most efficient technology currently available, making use of an existing grid connection and this is a material consideration of significant positive beneficial weight in determining this application.

Design

- 6.20. The overall design and layout of the application scheme has been designed to minimise harm within the application site and the wider area, such as utilising space efficient technology, whilst providing significant benefits. The scheme has been shown to provide landscaping and ecological enhancements.

- 6.21. Given this positive approach to design and incorporating mitigation measures, significant positive weight should be afforded to this consideration in the planning balance.

Landscape Enhancements

- 6.22. The submitted Landscape Masterplan (ref: 3823 Buxton Illustrative Plan) shows a gain on site in terms of tree and wildflower planting.
- 6.23. These measures will serve to create a coherent landscape framework across the Proposed Site which will enhance landscape character during the operational lifetime of the Proposed Development.
- 6.24. This represents an environmental benefit which should be given significant positive weight in favour of planning permission being granted.

Ecological Enhancements and Biodiversity Net Gain (BNG)

- 6.25. The Applicant has ensured that the proposed development has provided at least 10% Biodiversity Net Gain onsite. The proposed development will result in a net gain of 35.43% for non-linear habitats.
- 6.26. Overall, these measures represent an environmental benefit which should be given substantial positive weight in favour of planning permission being granted.

Economic Benefits

- 6.27. The economic benefits of the proposal include a significant financial investment into the local and wider economy with jobs (both direct jobs on-site and indirect/induced roles) being created during the construction period. Grenergy will seek local contractors where possible for civil engineering works, as well as operational phase maintenance contractors to maintain the proposed landscaping and plant on site. Moreover, local suppliers will also be sought during the construction and decommissioning phase of the proposed development.
- 6.28. It is also recognised that considerable development and investment within the region is hindered by inability to secure connection capacity from the network such as residential, commercial and industrial development. Battery Energy Storage would assist in the area by alleviating network constraints to aid the development of these sectors, thus improving economic conditions in the region.

Conclusions

- 6.29. In summary, it is concluded that the proposed development accords with the relevant local and national planning policy and numerous material considerations are identified that weight in favour of granting planning permission. These material considerations are demonstrated below:

Material considerations which are a Benefit	Weight (Positive)
The need for low-carbon technology and energy storage	Substantial Positive Weight
Best Available Technology	Significant Positive Weight
Design	Significant Positive Weight
Landscape Enhancements	Significant Positive Weight
Ecological Enhancements and Biodiversity Net Gain	Significant Positive Weight
Economic Benefits	Significant Positive Weight
Material Considerations which are Neutral	Weight (No Weight)
Trees	No Weight
Noise	No Weight
Flood Risk and Drainage	No Weight
Fire Safety	No Weight

7. Conclusion

- 7.1. This statement has been prepared by Pegasus Group on behalf of the applicant, Greenergy, in support of their planning application for a Battery Energy Storage System and associated works at land west of the A6, Upper End, Buxton.
- 7.2. The development supports the UK Government's intention to move to a net-zero economy, which when considering the delivered capacity and connection timeframes, 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.
- 7.3. The significant benefits associated with this proposal, primarily through the storage and generation of renewable energy to provide low carbon electricity and a valuable contribution towards meeting the challenging obligations of the Government regarding renewable energy generation, and also in the form of economic investment and ecological and landscape enhancements, are factors which weigh heavily in favour of this development.
- 7.4. This statement therefore demonstrates that, upon considering the following matters, this proposal, on balance falls well within the scope of acceptability:
- compliance with the Development Plan and national planning policy guidance.
 - the significant benefits associated with the scheme; and
 - the relatively benign impacts associated with the development.
- 7.5. 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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