

DWD

Planning, Design and Access Statement

Necton Greener Grid Park

Land to south of Necton Substation,
Necton, Swaffham, PE37 8EG

Statkraft UK

6 New Bridge Street
London EC4V 6AB

T: 020 7489 0213

F: 020 7248 4743

E: info@dwdllp.com

W: dwdllp.com

Disclaimer

This report has been produced by DWD, the trading name of Dalton Warner Davis LLP, a Limited Liability Partnership. Registered in England No. OC304838. Registered Office: 6 New Bridge Street, London, EC4V 6AB. The report is intended for the sole and exclusive use of the instructing client or party. The report shall not be distributed or made available to any third party or published, reproduced or referred to in any way without the prior knowledge and written consent of DWD. The report does not constitute advice to any third party and should not be relied upon as such. DWD accepts no liability or responsibility for any loss or damage to any third party arising from that party having relied upon the contents of the report in whole or in part.

CONTENTS

1.0 INTRODUCTION	1
Overview	1
Statkraft	1
Environmental Impact Assessment	2
Pre-Application Consultation	2
Planning Application and Submission	2
Purpose and Structure of this Report	3
2.0 NEED.....	5
Greener Grid Park – Synchronous Compensators	5
Site-Specific Need for Synchronous Compensators.....	8
Development on Best and Most Versatile Agricultural Land.....	9
3.0 THE SITE AND SURROUNDING AREA	11
Location, Description and Use	11
Planning and Environmental Designations	11
Site Selection.....	13
Planning History	13
Norfolk Vanguard and Norfolk Boreas.....	14
4.0 PROPOSED DEVELOPMENT	15
Development Summary	15
Access.....	16
Cable Routing	17
Landscaping	17
Construction.....	17
Operation	18
5.0 DESIGN APPROACH.....	19
Design Principles	19
Design Approach.....	19
Design Evolution	20
6.0 DESIGN COMPONENTS.....	21
Use	21
Amount	21
Layout	21
Scale	22
Appearance.....	22
Access.....	22
7.0 PLANNING POLICY CONTEXT	24
Local Planning Policy	24
National Planning Policy	25
Other Material Considerations	26
8.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT.....	29

Principle of Development 29
 Development in the Countryside 31
 Landscape and Visual 32
 Scale, Appearance and Design 33
 Biodiversity 35
 Traffic and Transport 40
 Flood Risk and Drainage..... 42
 Contaminated Land..... 43
 Historic Environment 44
 Public Amenity 45

9.0 SUMMARY AND CONCLUSIONS47

TABLES

Table 1.1: Structure of this document 4
Table 3.1: Nearby Planning History..... 13

FIGURES

Figure 2.1: Short Circuit and Inertia Requirements for Stability Phase 3 6
Figure 2.2: 2030 and 2050 modelled changes on the Balanced Pathway 7
Figure 3.1: MAGIC Map Extract..... 12
Figure 3.2: Flood Map for Planning..... 13

APPENDICES

APPENDIX 1: LIST OF PLANS

APPENDIX 2: VISUALS

Revision	Description	Originated	Checked	Reviewed	Authorised	Date
1	FINAL V1	GS	JM	JM	CT	Aug 2023
DWD Job Number: 16337						

1.0 INTRODUCTION

Overview

- 1.1 This Planning, Design and Access Statement ('PDAS') has been prepared in support of an application for full planning permission submitted to Breckland Council (the 'Council') under the provisions of the Town and Country Planning Act 1990 (as amended) on behalf of Statkraft UK Ltd ('Statkraft' or the 'Applicant').
- 1.2 This application is seeking permission for the Construction and operation of a Greener Grid Park comprising synchronous compensators, transformers, ancillary plant, underground electricity ducting and cabling to connect to the existing substation, formation of temporary construction access and associated hard and soft landscaping (the 'Proposed Development').
- 1.3 The project is known as the 'Necton Greener Grid Park ('GGP'). The GGP's key function is to provide critical Grid balancing services and to strengthen and stabilise the electricity network and to facilitate the connection of more renewable energy generation to the system. The proposed development will not generate any additional electricity nor will it result in any direct operational emissions of CO₂.
- 1.4 The proposed development site (the 'Site') is located south of Necton Substation and to the east of the A47. The Site is located within the administrative area of Breckland Council and is located approximately 600 metres ('m') north-east from the village of Necton and a further 35km to the west of the centre of Norwich.
- 1.5 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050. This requires major investment in renewable electricity generation technology alongside equally important investment in technology to balance the electricity grid. The Proposed Development would help to address this need by providing much needed stability and resilience whilst supporting the decarbonisation of the Electricity Grid.

Statkraft

- 1.6 Statkraft is 100% owned by the Norwegian state and is Europe's largest generator of renewable energy. In the UK, Statkraft develop, own and operate wind, solar, hydro and Greener Grid Park projects.
- 1.7 Since 2006 Statkraft has invested over £1.4 billion in the UK's renewable energy infrastructure and is a leading provider of Power Purchase Agreements (PPAs), having facilitated over 6 GW of new-build renewable energy generation through PPAs. Statkraft were appointed deliver grid stability

services to National Grid ESO, supporting their target to deliver a zero-carbon electricity system by 2025. The first two projects in Moray and Liverpool are operational.

Environmental Impact Assessment

- 1.8 The Applicant submitted a request for an Environmental Impact Assessment ('EIA') Screening Opinion from the Council on 11 May 2023 (Planning App Ref 2023/0003/SCR). The Applicant received a Screening Opinion from the Council on 13 July 2023 confirming that the Proposed Development does not require an EIA.

Pre-Application Consultation

- 1.9 The Applicant has undertaken pre-application consultation with the local community, details of which can be found in the Consultation Statement submitted alongside this application.
- 1.10 The Applicant has undertaken pre-application with Breckland Council (3PE/2022/0121/PEA, 26 July 2023) and have a Planning Performance Agreement (PPA) in place.

Planning Application and Submission

- 1.11 The application submission comprises of this PDAS and the following documents:

- Cover Letter
- Application Form
- Planning drawings (A full list is set out in Appendix A of this report)
- Alternative Site Assessment
- Statement of Community Involvement
- Agricultural Land Classification ('ALC') Survey
- Arboricultural Impact Assessment
- Archaeology and Heritage Statement
- Geo-Environmental Desk Study
- Ecological Assessment
- Flood Risk Assessment and Drainage Strategy
- Landscape and Visual Appraisal
- Environmental Noise Impact Assessment

- Transport Statement & Construction Traffic Management Plan
- 3D Visuals

1.12 The application has been submitted electronically via the Planning Portal and the requisite application fee has been paid to the Council.

Purpose and Structure of this Report

1.13 The primary purpose of this PDAS is to demonstrate how the design of the Proposed Development is a suitable response to the Site and its setting, and to demonstrate that it can be adequately accessed. Furthermore, this PDAS demonstrates how the Applicant has taken account of relevant planning policy and the extent to which the Proposed Development is compliant with the Statutory Development Plan.

1.14 In doing so, this PDAS draws upon and cross-refers, where relevant, to the other documents that form part of the planning application submission.

1.15 The PDAS has been prepared in accordance with Article 9 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Article 9 requires that all applications for major development, such as the Proposed Development, are accompanied by a 'design and access statement' that should:

- explain the design principles and concepts that have been applied to the development;
- demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
- explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account;
- state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation; and
- explain how any specific issues which might affect access to the development have been addressed.

1.16 The above details are contained in the remainder of this document.

Structure

1.17 The remainder of this document is structured as follows:

Table 1.1: Structure of this document

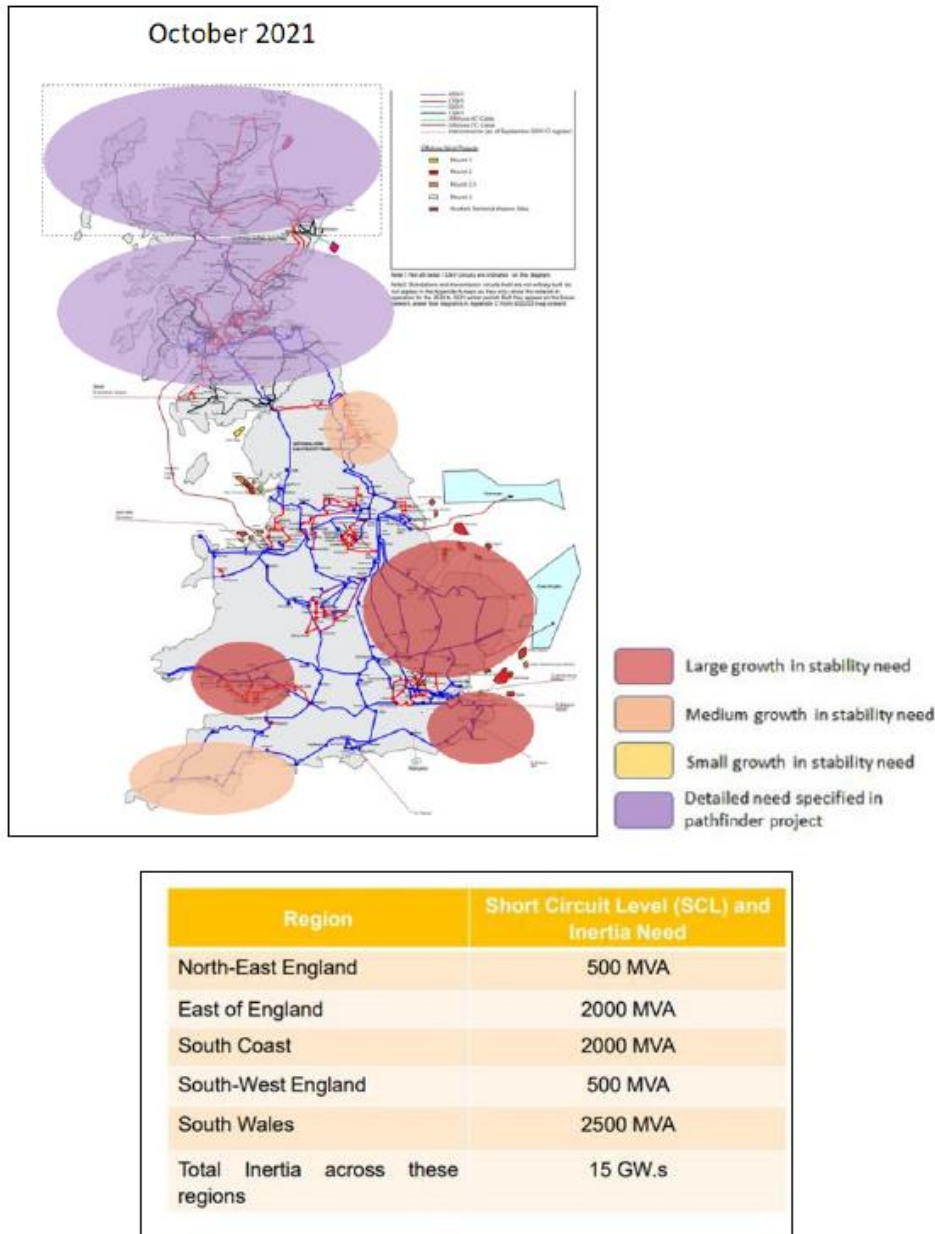
Section	Title	Overview
Section 2	Need	Sets out the significant need that exists for development of this type.
Section 3	The Site and surrounding area	Describes the Site and its key features, the planning history of relevance that relates to it, any local planning designations and allocations that apply, and the Applicant’s site selection process.
Section 4	The Proposed Development	Provides an overview of the Proposed Development, including use, amount, layout, appearance and access.
Section 5	Design approach	Outlines the approach taken to the design of the Proposed Development.
Section 6	Design components	Provides the design and access details of the Proposed Development, including layout, use, amount, scale, appearance, access and landscaping.
Section 7	Planning policy context	Sets out the legislative and policy framework for the determination of the planning application.
Section 8	Assessment of the Proposed Development	Provides an assessment of the Proposed Development against relevant policy at national and local level.
Section 9	Summary and conclusions	Sets out the conclusions of this PDAS in terms of the overall acceptability of the Proposed Development.

2.0 NEED

Greener Grid Park – Synchronous Compensators

- 2.1 Renewable technologies as a source of electricity are intermittent as the amount of energy generated is dependent on weather conditions. It is therefore necessary to balance demand and supply in order to prevent shortages and blackouts, such as those experienced in the East of England in August 2019. As such, there is a growing demand by network operators for a broad range of stability and flexibility services such as synchronous compensators and energy storage. The proposed development is designed to support the flexible operation of the National Grid and the decarbonisation of the electricity supply.
- 2.2 On Easter Sunday in 2020, renewable technologies met the demand of the electricity network, but due to their lack of stability (which is required to avoid blackouts and faults), National Grid had to curtail the renewable supply and instead turn on 17 gas powered plants. These fossil fuel-based facilities provide a fast-acting frequency stabilisation capability using the inertia from the massive, rotating generators found in coal, gas and nuclear power plants to stabilise the grid.
- 2.3 In addition, as many of these gas-powered facilities have been shut down as they no longer meet the required environmental and performance standards and existing nuclear power plants are reaching the end of their design lives, they are being replaced by the electronic based equipment found in wind and solar farms, and therefore, this critical stabilisation function has been much reduced. This lack of inertia on the system was one of the causes of the August 2019 electricity blackout that affected businesses across the country from Kings Cross station in London all the way up to a hospital in Newcastle.
- 2.4 However, the technology Statkraft are proposing for this development in the form of synchronous compensators, can replace the need for fossil fuels by providing stability services without emitting any carbon at all, making these issues a thing of the past whilst removing the cost to the environment and the consumer. National Grid have specifically identified the East of England as requiring a stability need as shown in Figure 2.1 and henceforth have led to National Grid Electricity System Operator (NGESO) to invite participants to tender for a Stability Pathfinder Phase Three contract in 2022.

Figure 2.1: Short Circuit and Inertia Requirements for Stability Phase 3



2.5 The proposed GGP will provide significant benefits to electricity consumers and to the environment by providing cuts to carbon emissions in the GB grid this decade. Rapid decarbonisation before 2030 is important and valuable in a Climate Emergency. Statkraft’s GGP is contributing to the UK’s pledge to meet the Carbon Budgets (Fourth Carbon Budget 2023-2027) and to deliver the 64% emissions reductions (see Figure 2.2) by 2030, in accordance with the Paris Agreement¹.

¹ Source: https://ec.europa.eu/clima/sites/clima/files/long_term_strategy_brochure_en.pdf

Figure 2.2: 2030 and 2050 modelled changes on the Balanced Pathway²



2.6 The Atkins Report – Engineering Net Zero – The Race to Net Zero 2020 dispels the myth that the UK can achieve Net Zero without further concerted action in relation to how we generate and distribute electricity³. This Report quantifies the minimum requirement for new generation of energy to meet Net Zero by 2050 at 250 GW. The proposed development would provide rapid-response electrical back-up to the National Grid to complement this increase in generation and would represent an early deployment within the UK of a high-tech grid balancing facility.

2.7 This is required for a number of reasons:

- Electricity Market Reform
- The Capacity Market
- Balancing and Stabilising the Network

2.8 National Grid’s has set itself a target of “by 2025, National Grid will have transformed the operation of Great Britain’s electricity system and put in place the innovative systems, products and services to ensure that the network is ready to handle 100% zero carbon.”⁴ This is an extremely challenging target, which has been necessitated by the changing dynamic of the UK Electricity system; the which has been necessitated by the changing dynamic of the UK Electricity system; the closing of

² https://www.theccc.org.uk/wp-content/uploads/2021/01/Path-to-Net-Zero-the-role-of-business-slides_FINAL.pdf

³ Atkins & SNC Lavalin [2020] Engineering Net Zero: the Race to Net Zero

⁴ National Grid: “Zero carbon operation of Great Britain’s electricity system by 2025”

<https://www.nationalgrideso.com/news/zero-carbon-operation-great-britains-electricity-system-2025>

Coal and Nuclear Power Stations and a greater dependence on renewable energy. As previously stated, Statkraft is developing a national network of GGPs to enable this target to be met.

- 2.9 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050. This requires major investment in proven technologies, such as solar and wind, which is strongly supported by planning policy at local and national level. The Proposed Development would be completely consistent with, and in support of, the Net Zero commitment.
- 2.10 Net Zero Strategy: Build Back Greener (2021) states, *“By 2035, all our electricity will need to come from low carbon sources, subject to security of supply, moving to a fully decarbonised power system whilst meeting a 40-60% increase in demand. This means increased investment in the grid network, electricity storage solutions and flexible grid management, to ensure decarbonisation without risking security of supply”*.
- 2.11 Synchronous Compensators are recently advanced technology and are not yet specifically supported within National Planning Policy. However, it is contended that the strong policy support for renewable energy development should apply to Synchronous Compensators due to their essential role in providing continued operation and stability of the National Grid without carbon emissions of their own. These machines are designed to deliver the inertia needed to stabilise the grid and thus eliminate the need to run fossil-fired power plants. With the help of flywheels, the stabilisers can "store" kinetic energy in the same way as turbines.
- 2.12 Statkraft is already an established and leading provider of synchronous compensators with operational sites at Keith in Moray, Scotland and Lister Drive in Liverpool, England already playing a major part in the delivery of a greener, secure and stable grid⁵.

Site-Specific Need for Synchronous Compensators

- 2.13 It is important to note that Necton GGP is one of the Stability Pathfinder Phase 3 ('SPP3') projects awarded by National Grid ESO as part of their effort to deliver long-term stability for the national electricity network, which will help reduce the carbon intensity of the grid, enabling the ESO to operate the network with zero-carbon by 2025 and set up the UK to deliver a net-zero electricity system from 2035 by providing stability services without the use of carbon over this period⁶. This is expected to deliver over £14.9bn of savings by 2035.

⁵ <https://www.nationalgrideso.com/news/first-phase-stability-pathfinders-delivered>

⁶ <https://www.nationalgrideso.com/news/eso-announces-new-contracts-deliver-over-ps14-billion-savings>

2.14 The Necton GGP is of particular regional importance as it is expected to provide two-thirds of the East of England's inertia following its successful tender to National Grid ESO as part of their NAO Stability Pathfinder – Phase 3⁷.

Development on Best and Most Versatile Agricultural Land

2.15 The Proposed Site comprises Best and Most Versatile Agricultural Land. An Agricultural Land Classification Survey was carried out for the Site which showed that the Site comprises Subgrade 3a (Good Quality) agricultural land. This survey has been submitted as part of this application. The rest of the site is classified as non agricultural/other land.

2.16 The Breckland District Council Local Plan Policy GEN 01 (Sustainable Development in Breckland) lays out the Council's priorities in regard to Sustainable Development which include (as relevant):

- *Mitigate and adapt to Climate Change;*
- *Protect and enhance the natural, built and historic environment;*
- *Assist in the creation and maintenance of inclusive, environmentally sustainable communities making the best and most efficient use of previously developed land, buildings and natural resources; and*
- *Consideration of the cumulative impact of development, in particular, the impact on the environment.*

2.17 Policy ENV 10 (Renewable Energy Development) of the Local Plan states, to help meet government targets renewable energy will need to be considered, *"There are many different types of renewable energy choices, from solar energy, wind and biomass through to energy efficient installations such as combined heat and power and ground source heating. All of these technologies and methods of construction have a role to play in meeting Government targets and were seen as positive outcomes for the borough in the Sustainability Appraisal"*.

2.18 The above is further iterated in Policies CP 12 (Energy) and DC 15 (Renewable Energy) of the Core Strategy, which support commercial scale renewable energy development, in principle. In particular, Policy CP 12 states *'Commercial scale renewable energy generation developments will be supported throughout the District. Large scale developments of this type will be subject to a comprehensive environmental assessment which will be based on the individual and unique*

⁷ <https://www.nationalgrideso.com/future-energy/projects/pathfinders/stability/Phase-3>

circumstances of the case. When considering such assessments, regard will be given to the wider environmental benefits of providing energy from renewable sources as well as effects on amenities and the local environment’.

- 2.19 The Alternative Site Assessment submitted alongside this application provides justification for the location of the site. The technical needs of the Site including cable connection, proximity to the substation and suitable highway access, amongst other factors, have been used to assess the feasibility of the surrounding sites for the Proposed Development.
- 2.20 It is widely considered that the harm caused by the limited loss of agricultural land in respect of renewable energy provision is a significantly outweighed in the context of the current Climate Emergency, need for energy security and the sustainable development objectives set out in the NPPF. The Proposed Development will provide significant enhancements to the grid’s capability to increase use of renewable energy.
- 2.21 Additional Local Planning Policy relevant to the Proposed Development can be found in Section 4.0 of this report.

3.0 THE SITE AND SURROUNDING AREA

3.1 This section describes the location and key features of the Site and the surrounding area, identifies any relevant planning and environmental designations, and explains the Applicant's site selection process.

Location, Description and Use

3.2 The Site is located within the administrative boundary of Breckland Council and is located approximately 600 m north east from the village of Necton and a further 35km to the west of the centre of Norwich. A Site Location Plan is submitted as part of this application.

3.3 The Site is approximately 12.78 ha in size and is largely comprised of agricultural land, though the main compound covers approximately 1.92 ha. There is some existing screening in the form of trees found along the western boundary of the Site. The Site can be accessed from an existing access off the A47 to the west of the Site, which is a single carriageway with a 60mph speed limit, with a further temporary construction access proposed.

3.4 Within the wider area there are several farmsteads that are scattered around. Corbett Farm is the closest and found approximately 440 m to the north west of the Site. The closest residential dwellings can be found on St Andrews Lane approximately 600 m to the south of the Site. To the immediate north of the Site is Necton onshore substation which is a primary driver for the location of this development. Pylons can be found running into the power station and in close proximity to the application site, however none of these cross over the Site. The Site is otherwise surrounded by agricultural fields and areas of small areas of woodland. There are several constructed and approved energy projects in located nearby Site, further details of which can be found in the Planning History section of this chapter.

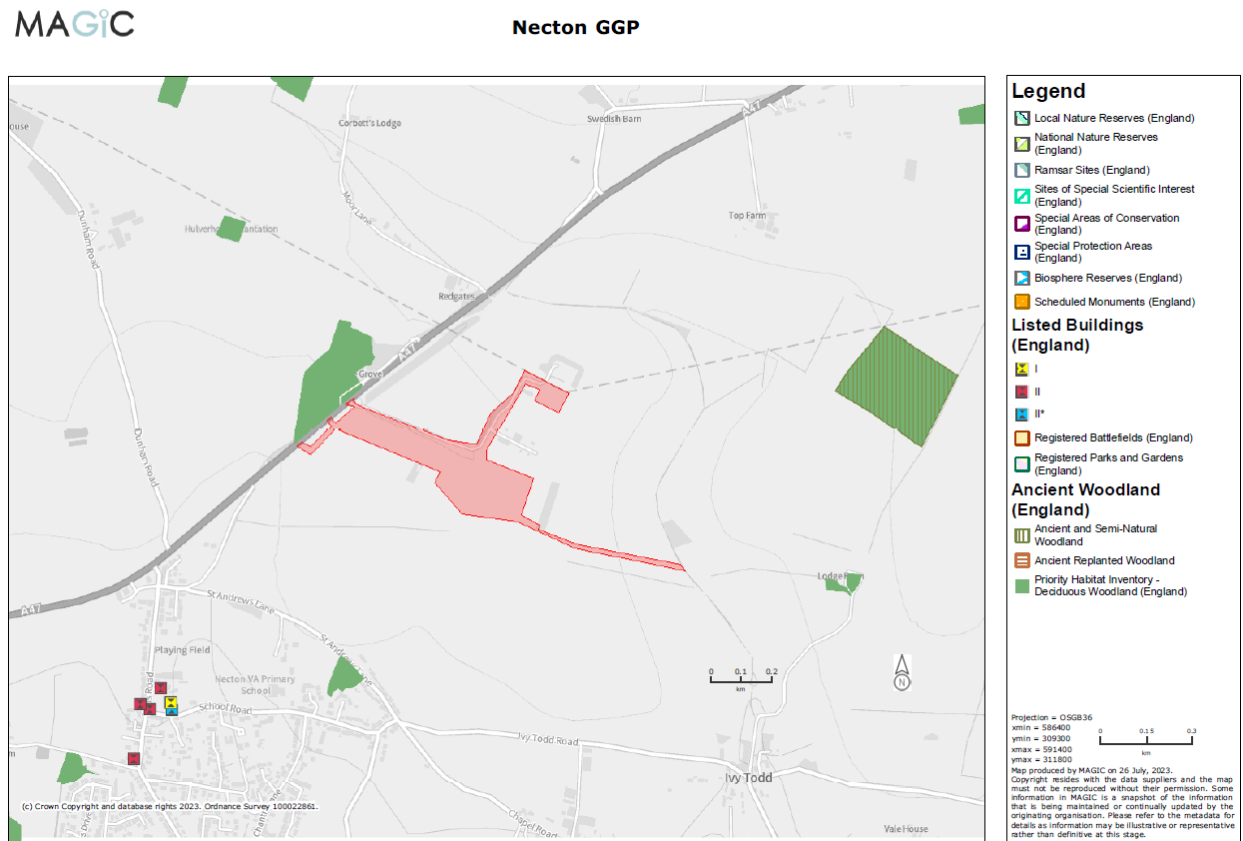
3.5 An Agricultural Land Classification Survey was carried out for the GGP Site which showed that the Site comprises Subgrade 3a (Good Quality) agricultural land. This survey has been submitted as part of this application.

Planning and Environmental Designations

3.6 A search of the Government's MAGIC Map database, an extract from which is included below at Figure 3.1, revealed that there are no environmental assets located on Site. The closest environmental asset is a Priority Habitat Inventory for Deciduous Woodland which is found to the immediate west of the Site. In addition, there are also no heritage assets on Site, with the closest heritage assets being four Grade II, one Grade I and one Grade II* listed buildings found

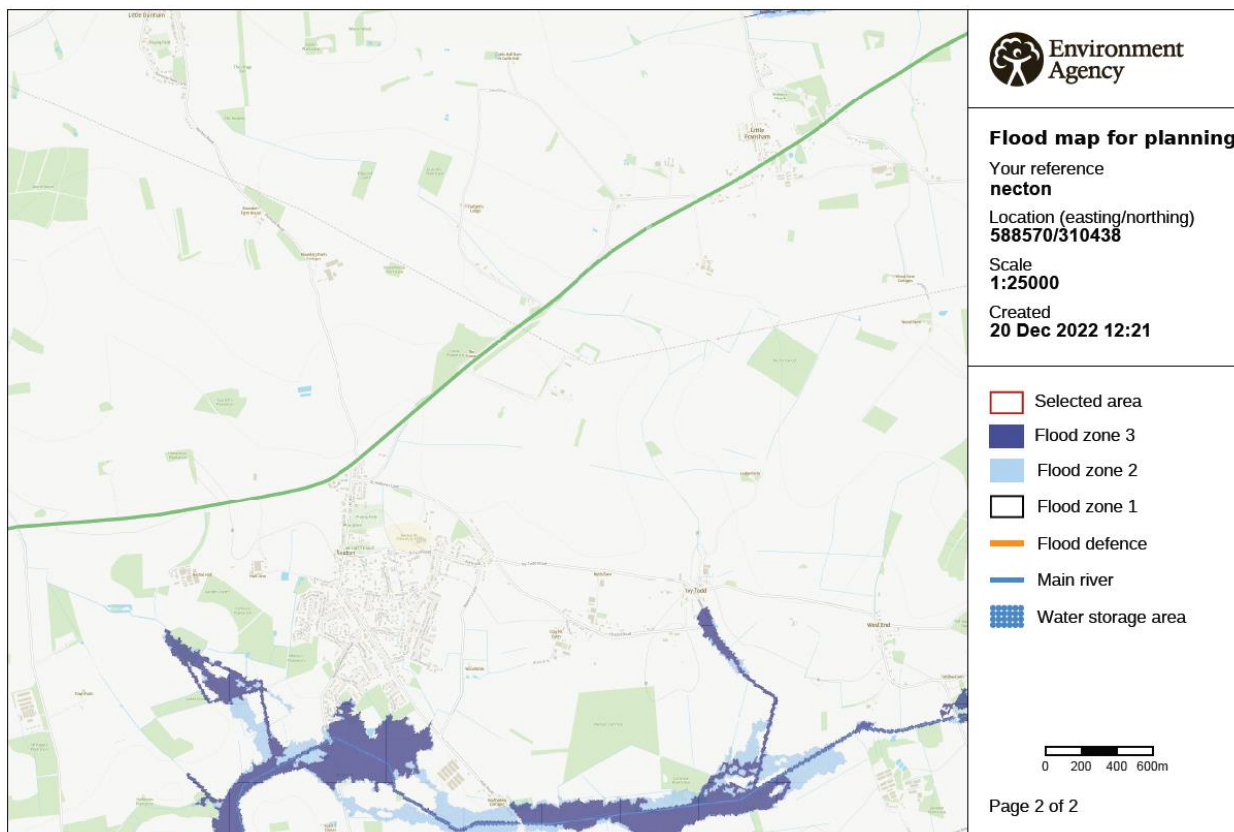
approximately 1km to the south west of the Site. There is also a scheduled monument located approximately 1.8km to the southeast of the Site. In regards to the historic assets it is considered that there would be no impact on these as a result of the proposal due to there being numerous residential dwellings as well as St Andrews Lane acting as a buffer between the Site and the Listed buildings.

Figure 3.1: MAGIC Map Extract



3.7 The Site is located in Flood Zone 1. This therefore means that the Site is at low risk of flooding. An extract of a Flood Map for Planning can be found below at Figure 3.2: Flood Map for Planning Extract. Nevertheless, due to the size of the Site a full Flood Risk Assessment and Drainage Strategy has been submitted as part of the application.

Figure 3.2: Flood Map for Planning



Site Selection

3.8 An Alternative Site Assessment has been submitted as part of this application, setting out the justification for the selection of the Site.

Planning History

3.9 The application site is agricultural land. A search of Breckland Council online planning register identified that there is no site-specific planning history relating to the Site.

3.10 The following planning applications were identified in the vicinity of the application site and are considered relevant to the proposed development:

Table 3.1: Nearby Planning History

Application reference	Status	Description
EN010079	Approved – 11 February 2022	Norfolk Vanguard Offshore Wind Farm Order 2022, as amended by The Norfolk Vanguard Offshore Wind Farm Order 2022 (Amendment)
EN010087	Approved – 10 December 2021	Norfolk Boreas Offshore Wind Farm Order 2021, as amended by The Norfolk Boreas Offshore Wind Farm (Amendment) Order 2022

3PL/2022/1003/F	Undecided	Proposed extension to the eastern end of the existing Necton 400kV substation (installation of a new bus coupler (Bus Coupler 3)). The need for the proposed substation extension is to ensure the network remains secure, resilient and reliable with the increase in generation in the wider region, ensuring compliance with the Security and Quality of Supply Standard at National Grid Necton 400kV Substation Off Norwich Road (A47)
3PL/2019/1183/F	Approved – 19 February 2021	Erection of 27 dwellings with associated access, parking, landscaping and surface water attenuation at Land off North Pickenham Road Necton
3PL/2019/1184/D	Approved – 19 February 2021	Reserved matters application following outline permission - 3PL/2016/0983/O - appearance, layout, scale and landscaping associated with the erection of 46 dwellings, together with the provision of public open space and surface water attenuation pond at Land off North Pickenham Road Necton

Norfolk Vanguard and Norfolk Boreas

- 3.11 As mentioned above, Norfolk Vanguard (Ref. EN010079) was approved in February 2022 while Norfolk Boreas (Ref. EN010087) was approved in December 2021, both as Nationally Significant Infrastructure Projects via the Development Consent Order process.
- 3.12 The applications for both schemes involve upgrading the existing Necton substation and providing nearby ancillary infrastructure in order to support it allow the electricity generated by the off-shore wind farms to be fed into the electrical grid.
- 3.13 Please note that the Proposed Development is fully independent from the two above applications and is not reliant on their construction. In addition, the Proposed Development has been carefully designed to take account of these applications so as to not conflict with their construction and operation.

4.0 PROPOSED DEVELOPMENT

4.1 This section provides a description of the Proposed Development including its main components and development features with reference to the submitted plans and other application documents.

4.2 The planning application seeks full planning permission for the following Proposed Development:

“Construction and operation of a Greener Grid Park Facility comprising synchronous compensators, transformers, and ancillary plant, underground electricity ducting and/or cabling to connect to the existing substation, and associated hard and soft landscaping.”

Development Summary

4.3 The Proposed Development is for a grid stability facility (to be known as a ‘Greener Grid Park’ or ‘GGP’) which will comprise the following:

4.4 The proposed development will comprise of the following:

- 2 no. of Communications House each measuring 7m in length by 13m in width and with a height of 3.5m.
- 2 no. Emergency Generators each measuring 3.5m in length by 12.95m in width and with a height of 3.5m.
- 2 no. Offices each measuring 3.1m in length by 9.8m in width and with a height of 3.5m.
- 2 no. Stores each measuring 2.4m in length by 6.1m in width and with a height of 2.60m
- 1 no. Cooler 1 measuring 8.2m in length by 2.8m in width and with a height of 2.5m.
- 1 no. SC Building measuring 15m in length by 12.5m in width and with a height of 7m
- 1 no. Aux Transformers measuring 3m in length by 2m in width and with a height of 3.6m.
- 1 no. Cooler 2 measuring 9.7m in length by 12.9m in width and with a height of 2.6m.
- 1 no. Control Container measuring 16 m in length by 21m in height and with a height of 5.2m.
- 1 no. HISC Building measuring 18m in length by 28m in width and with a height of 11m.
- 1 no. Circuit Breaker and Auxiliary Transformer measuring 18.4m in length by 12.5m in width and with a height of 10m.
- 1 no. HV Yard measuring 78.6m in length by 42.2m in width by 11.87m in height.
- Indicative Proposed Cable Corridor to Point of Connection of Substation.

- Permanent Road Option which connects onto the existing track that serves access to Necton substation.
- Temporary Construction Access.
- Palisade fencing including electrical pulse fence with security gate to height of 3m.
- Weldmesh fencing including electrical pulse fence with security gate to height of 3m.
- CCTV Light Posts measuring to 6m with downward facing motion sensing lighting.
- Landscape and Biodiversity Mitigation Planting.
- 1 no. SUDs basin and indicative pipeline corridor.
- All associated and ancillary site works necessary to facilitate the development including: all necessary drainage systems, foundations works for the above compounds, various underground cables and ducts, equipment plinths, internal services roads and other necessary infrastructure.

4.5 Computer generated images of the Site, from the north and south, showing the Proposed Development in situ can be found at Appendix 2 of this report, demonstrating how the proposed landscaping will look after 0 years, 5 years and 15 years.

Access

- 4.6 During operation, the Proposed Development will be accessed via the existing agricultural field accesses taken from the substation access junction onto the A47. This application also includes a temporary construction access further south west along the A47 to remove the potential for confusion and accidents at the existing substation site access junction, which is to be used during the construction of Vattenfall's DCO projects.
- 4.7 A temporary Left In / Left Out junction, designed in accordance with the DMRB standards and located 250m to the southwest of the existing access junction would allow safe and efficient construction access to the Statkraft site by segregating construction traffic and allowing a more effective traffic management plan to be set up.
- 4.8 The access junction is located on a section of road with good forward visibility and compliant visibility splays of 215m in either direction can be accommodated. The proposed layout is provided in Appendix A.

4.9 The junction would be temporary in nature and would not be permanent. Upon completion of the construction works, the junction would be removed in full and the verge restored. All operational and maintenance activities would be taken from the existing substation access junction.

4.10 Further information on the proposed temporary access is contained within the Transport Statement and Construction Management Plan submitted as part of this application.

Cable Routing

4.11 The Proposed Development will be connected into the electricity grid by an underground cable which will connect to the existing Necton Onshore Substation located to the north of the Site.

Landscaping

4.12 The Proposed Development includes a landscaping strategy which has been designed to respect the area's landscape character and visual appeal. These measures include:

- Pitched roofs on the energy management buildings which will be painted in moss green (or a recessive colour scheme to be agreed with the Council via condition) so that they have an agricultural appearance;
- Proposed tree and shrub planting (approximately 5,000m²) to the southern site boundary which will aid screening of the proposals from Necton; and
- Proposed conversion of approximately 12,700m² agricultural land to scrub for biodiversity net gains.

4.13 Further information on these measures, including the species mix and growth rates, and their location can be found in Appendix E (Mitigation Plan) of the Landscape and Visual Appraisal.

Construction

4.14 The construction and installation of the Development will take approximately 14 months. The sequence of construction activities is anticipated as follows:

- Site surveys & welfare;
- Construction of the access route to site;
- Earthwork for foundations/cable runs;
- Balance of plant and temporary site equipment;
- Major equipment delivery;
- Assembly of major equipment;

- Construction of main building over installed equipment;
- Installation of supporting equipment; and
- Testing and commissioning.

4.15 Construction of the proposed development will generate approximately 66 movements vehicle movements per day at the peak of construction. It is expected that during the peak month of construction (Month 2), 52 two-way HGV movements per day will occur per day. A further 14 car / LGV trips would be created by construction staff travelling to and from the site.

Operation

4.16 Based upon the operation of Statkraft's operational site in Keith, which is similar to the proposed development, it is expected that daily access by two staff per day would be required as part of Operation and Maintenance requirement. The site is typically operated un-manned. This level of traffic generation is not considered significant and no wider traffic impact review would be required for the operational phase.

Decommissioning

4.17 At the end of the Proposed Development's lifespan the Proposed Development would be removed, and the Site restored.

4.18 The restoration process is intended to ensure that the land is restored to the same quality as previously and it is envisaged this would be secured through a suitable condition attached to any planning permission.

5.0 DESIGN APPROACH

5.1 This section sets out the approach that the Applicant has taken to the design of the Proposed Development and how the design has evolved through the pre-application process.

Design Principles

5.2 The main design principles adopted by the applicant are:

- Design Principle 1: Seek to assimilate the Proposed Development into the local landscape and preserve the open character of the landscape;
- Design Principle 2: Ensure safe and efficient access to the public highway;
- Design Principle 3: Seek opportunities for the management and enhancement of biodiversity; and
- Design Principle 4: Position the main components to minimise environmental impact and impact on residential amenity.

Design Approach

5.3 The approach taken to the design of the Proposed Development has been informed by technical requirements of the Proposed Development and the context within which it would be situated, including nearby developments, in addition to the opportunities and constraints presented by the Site.

5.4 The immediate and wider context of the Site is currently characterised by a mixture of energy found to the north and agricultural uses around the remainder, as well as deciduous woodland, with more energy related development proposed and approved. Extensive landscaping has been proposed to allow the Proposed Development to be in keeping with the more natural elements of its surroundings and reduce the potential for significant cumulative visual impacts. The general design and siting of infrastructure has been designed to respect the character of the Site whilst being practical and efficient in terms of technical and engineering considerations.

5.5 The main components of the facility will be dark green, to blend in the Development with the adjacent substation. This will result in the Development being read as an extension to the substation rather than as a separate built form within the rural landscape.

5.6 The nearby approved DCO projects represented a significant constraint when selecting the site location and the layout of the Proposed Development, as key infrastructure had to be kept off land which may be required for their construction and operation.

Design Evolution

- 5.7 The design and layout of the Proposed Development has evolved significantly since May 2022 when pre-application advice was initially sought from the Council. This pre-application looked at the potential three separate Sites, however, the pre-application response from the Council suggested that Site B was the preferred option. This was due to its close location to the existing substation. The layout proposed for Site B was also favoured as it was considered to form a continuous development with the existing substation.
- 5.8 Since the pre-application took place, the proposed Site has been slightly repositioned so that it is further west than the original position of Site B. The Site Layout has also been slightly adjusted to accommodate the change.
- 5.9 The Site and Layout have also been adjusted in order to accommodate a water attenuation basin and a pipe for drainage as well as space for landscaping and ecology enhancements.
- 5.10 Earlier iterations of the Proposed Development included battery storage, however, this was removed in order to focus on responding to the key grid requirements in this area.

6.0 DESIGN COMPONENTS

6.1 This section describes the key components of the Proposed Development. This includes in relation to the Site's use, the quantum of development (amount), the proposed layout, the scale of main structures, the appearance and the approach taken to landscaping.

Use

6.2 The Proposed Development is for a Greener Grid Park facility comprising synchronous condensers, transformers and associated infrastructure. The site currently comprises agricultural land (arable) in a rural fringe countryside setting.

6.3 The GGP has undergone extensive review to be sympathetic to its surroundings whilst being practical in terms of technical and engineering considerations. The southern half of the field will be retained as arable land, whilst arable land excavated to construct the GGP will be collected in a topsoil bund and stored for the lifetime of the development

Amount

6.4 The various components of which the Proposed Development comprises is set out in paragraph 4.4.

6.5 In addition, a sympathetic landscaping scheme has been designed. Please refer to the LVA submitted as part of this application for more detail.

6.6 In total, the entire proposed development is considered to be the minimal level of development necessary to ensure that the site performs effectively with regards to its main purpose of stabilising the Electricity Grid.

Layout

6.7 Throughout the design process, the site layout has been assessed by planning and environmental specialists in respect of, landscape and visual, cultural heritage, ecology, flood risk and drainage, noise, arboricultural and traffic considerations. Each specialist has visited the site and identified the presence or absence of potential environmental constraints and opportunities. This analysis in conjunction with the feedback received from Breckland Council and community consultation has informed the layout of the site. There are technical factors which limit the extent to which the layout and design of the Proposed Development can be adjusted however the design iterations to the site layout have ensured that the Proposed Development has as little impact on the environment as possible.

6.8 The GGP is set within an existing field with its field boundaries retained and fortified. It is proposed that the GGP will occupy the northern part of the field which is further away from receptors within

the village of Necton. As the GGP is found to the immediate south of the existing Necton Substation there will be limited visual impact found to the north of the Site. The south of the Site will benefit from extensive screening in the form of trees and a shrub belt. It is therefore considered that the Site and GGP will integrate well into the surrounding rural landscape character.

Scale

- 6.9 The scale of development at the Site is in part determined by the equipment necessary to effectively operate the GGP most efficiently. The tallest structures comprise the HV equipment which is 11.87 m in height and the HISC Building which is 11 m in height. It is notable that nearby on-shore buildings relating to the approved DCO projects have maximum height parameters of 25 m, while the nearby existing substation has a maximum height of up to 10.5 m and the proposed substation extension (Planning application reference: 3PL/2022/1003/F) also has a proposed height of up to 10.5 m. Therefore, it is considered that the height of the Proposed Development is in keeping with the area.
- 6.10 Landscaping is proposed, and it is considered that once this matures it will provide sufficient screening, therefore helping the Proposed Development assimilate into the landscape over time. When viewed from nearby vantage points the scale of development would not be overbearing due to its comparatively low profile.

Appearance

- 6.11 The buildings, e.g. e-buildings, Comms house, office, energy management buildings and fence will be finished in a sympathetic colour which is to be defined following consultation with the Landscape Officer during the determination of the application. The visuals have currently been finished in moss green to act as a representative example. The HV Yard contains technical and functional design characterised by electrical plant connected by overhead bus bars.
- 6.12 Cabling between the GGP and the Necton Substation would be underground meaning that there would be no visual impact associated with this element of the Proposed Development.

Access

- 6.13 During operation, the Proposed Development will be accessed via the existing agricultural field accesses taken from the substation access junction onto the A47. This application also includes a temporary construction access further south west along the A47 to remove the potential for confusion and accidents at the existing substation site access junction, which is to be used during the construction of Vattenfall's DCO projects.

- 6.14 The temporary access was selected and developed following consultation with National Highways to accommodate suitable visibility splays, minimise hedgerow loss, minimise impact on visual amenity, minimise impact on the agricultural activities and maximise road safety. The land on which the temporary access and track would be located would be fully re-instated to its current condition following completion of construction, including the re-instatement of any hedgerow which was temporary removed.
- 6.15 Further information on the proposed temporary access is contained within Section 4 of this report and the Transport Statement and Construction Traffic Management Plan submitted as part of this application.

7.0 PLANNING POLICY CONTEXT

- 7.1 This section provides a brief overview of the relevant planning policy and guidance at the local and national level. The Proposed Development has been influenced by these policies and is assessed against them at Section 8 of the PDAS.
- 7.2 The planning application would be determined in accordance with section 70(2) of the Town and Country Planning Act 1990 (as amended), which states that in dealing with applications, local planning authorities shall have regard to the provisions of the statutory development plan and to other material considerations, and section 38(6) of the Planning and Compulsory Purchase Act 2004, which states that for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

Local Planning Policy

- 7.3 The statutory development plan for the Site is the Breckland Local Plan (Adopted November 2019). The following policies from the LDP are considered to be the most relevant:
- ENV 01 - Green Infrastructure
 - ENV 02 - Biodiversity protection and enhancement
 - ENV 05 - Protection and Enhancement of the Landscape
 - ENV 06 - Trees, Hedgerows and Development
 - ENV 07 - Designated Heritage Assets
 - ENV 09 - Flood Risk & Surface Water Drainage
 - ENV 10 - Renewable Energy Development
 - GEN 01 - Sustainable Development in Breckland
 - GEN 02 - Promoting High Quality Design
 - GEN 03 - Settlement Hierarchy
 - GEN 05 - Settlement Boundaries
 - EC 06 - Farm Diversification;
 - COM 01- Design;
 - COM 02 - Healthy Lifestyles;

- COM 03 - Protection of Amenity;
- TR 01 Sustainable Transport Network; and
- TR 02 Transport Requirements.

National Planning Policy

7.4 The National Planning Policy Framework ('NPPF') was adopted in March 2012 and was most recently updated in July 2021. It sets out the Government's planning policies for England and how these are to be applied. The policies contained within the NPPF are expanded upon and supported by National Planning Practice Guidance ('NPPG'), which was first published in March 2014 and has been periodically updated since.

7.5 NPPG considered most relevant to the Proposed Development includes:

- Climate Change 15 March 2019;
- Historic Environment;
- Natural Environment;
- Green Belt;
- Open Space, sports and recreation facilities, public rights of way and local green space;
- Flood risk and coastal change;
- Renewable and low carbon energy; and
- Strategic environmental assessment and sustainability appraisal.

7.6 Paragraph 158(a) recognises that LPAs should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. Importantly, paragraph 158(b) states that applications for renewable and low carbon development should be approved if the impacts are (or can be made) acceptable.

7.7 The National Policy Statements ('NPSs') make up the planning policy framework for examining and determining Nationally Significant Infrastructure Projects ('NSIPs'). As the Proposed Development is not a NSIP, the NPSs are not directly relevant; however, they do form material considerations in the determination of the planning application.

7.8 The following NPSs are considered to be of relevance:

- Overarching Energy NPS (EN-1);
- National Policy Statement for Renewable Energy Infrastructure (EN-3); and
- National Policy Statement for Electricity Networks Infrastructure (EN-5).

7.9 Paragraph 1.2 of EN-1 states that it is “likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether, and to what extent, this NPS is a material consideration will be judged on a case by case basis” and this is repeated in the others. Given the Proposed Development’s status as essential electrical infrastructure they are considered to be of relevance here.

7.10 Paragraph 2.1.1 of EN-1 states *“Producing the energy the UK requires and getting it to where it is needed necessitates a significant amount of infrastructure, both large and small scale.”*

7.11 The following draft NPS⁸ published in March 2023 are also considered to be of relevance as they indicate the Government’s most recent position:

- Draft Overarching Energy NPS (Draft EN-1);
- Draft National Policy Statement for Renewable Energy Infrastructure (Draft EN-3); and
- Draft National Policy Statement for Electricity Networks Infrastructure (Draft EN-5).

Other Material Considerations

7.12 In June 2019 the Government raised the UK’s ambition on tackling climate change by legislating for a net-zero greenhouse gas emissions target for the whole economy by 2050. Decarbonising the power sector is integral to achieving this goal and will require a significant increase in the proportion of electricity generated by renewable energy.

7.13 The National Infrastructure Commission (‘NIC’), official advisor to the Government on infrastructure, has recommended that in order to meet the 2050 target the energy generation mix is up to around 90% renewables.

7.14 Whilst not planning policy documents, the following, also form material considerations:

⁸ <https://www.gov.uk/government/consultations/planning-for-new-energy-infrastructure-revisions-to-national-policy-statements>

- On 4 November 2021 the UK signed the Statement on International Public Support for the Clean Energy Transition⁹ at the United Nations Climate Change Conference UK 2021 (COP26) which committed to prioritising support fully towards the clean energy transition.
- The UK Government published its Energy White Paper ('the Paper')¹⁰ in December 2020. The Paper acknowledges that flexibility services have traditionally been provided by gas-fired power stations but that there is an opportunity for flexibility to be provided by cleaner sources. Additional physical infrastructure is required to maintain the resilience and reliability of the grid.
- The 2020 Committee on Climate Change Progress Report to Parliament¹¹ was published in May 2020 and provides a review of Government efforts over the previous 12 months with regards to Climate Change. To achieve low-carbon and climate-resilient infrastructure, grid flexibility and energy supply security, the report states that 'electricity networks must be strengthened across the UK to accommodate electrification of heat and transport' and recommends that the Government should implement the actions within the Smart Systems and Flexibility Plan.
- In May 2019 the Committee on Climate Change published Net Zero – The UK's Contribution to Stopping Global Warming¹². The report recommends a new emissions target for the UK: net zero greenhouse gas emissions by 2050. The Report highlights the falling cost of key renewable technologies and advises that flexibility in the energy supply (e.g. demand response, storage and interconnection) should be encouraged by policy and regulatory frameworks.
- The UK's Integrated National Energy and Climate Plan (January 2019)¹³ makes clear that in order to meet the UK's 2050 climate change target, improvements in energy efficiency and energy management are required. This includes smart technologies such as energy storage and system balancing.

⁹ <https://ukcop26.org/statement-on-international-public-support-for-the-clean-energy-transition/>

¹⁰ <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>

¹¹ <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

¹² <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

¹³ <https://www.gov.uk/government/publications/uk-national-energy-and-climate-plan-necp>

- In July 2017, BEIS and Ofgem published Upgrading our Energy System: Smart Systems and Flexibility Plan¹⁴. The Government aims to implement the actions in the Plan by 2022, enabling the electricity system to work more flexibly and efficiently, potentially unlocking £17-40 billion in savings across the electricity system by 2050.

7.15 There is a clear and growing body of policy support and evidence to demonstrate the UK's commitment to decarbonising the power system. Across all of these documents it is clear that decarbonisation will be achieved through a significant increase in the proportion of electricity generated by renewable means. It is therefore equally important that there is enough provision of ancillary services to support the deployment of further renewable generation capacity.

¹⁴ <https://www.gov.uk/government/publications/upgrading-our-energy-system-smart-systems-and-flexibility-plan>

8.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT

8.1 This section of the statement provides an assessment of the Proposed Development, in order to demonstrate how it has been influenced by and accords with the relevant planning policy.

Principle of Development

Policy Summary

8.2 **ENV 10** (Renewable Energy Development) generally supports new renewable energy and low carbon development. Proposals will be considered favourably if they:

- i. *“adverse impacts on the local landscape, townscape or designated and non-designated heritage assets assessed in line with Policies ENV 05, ENV 07 and ENV 08 in the plan;*
- ii. *adverse effects on residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare or any other associated detrimental emissions, during construction, operation and decommissioning;*
- iii. *an irreversible loss of the highest quality agricultural land;*
- iv. *cumulative impacts of renewable energy development on an area; and*
- v. *adverse impacts upon designated wildlife sites; nature conservation interests; and biodiversity, assessed in line with Policies ENV 02 and ENV 03 in the plan.”*

It should be demonstrated that any adverse impacts should be mitigated. Proposals will be assessed to ensure the amount and usability of energy generated outweigh any adverse impacts. *“When attributing weight to any harm, in addition to other relevant policies in the Local Plan, regard will be given to national policy and guidance, statutory duty and legislation which seeks protection and enhancement of the landscape; designated and non-statutory heritage assets. Where appropriate the authority will consider the need for planning conditions requiring the decommissioning and removal of all plant and ancillary equipment, and if necessary the restoration of land, on the cessation of use.”*

8.3 **GEN 01** (Sustainable Development in Breckland) aims to improve economic, social and environmental objectives. This will be achieved by:

- *“Mitigate and adapt to climate change;*
- *Protect and enhance the natural, built and historic environment;*

- *Allocate and facilitate developable land that seeks to provide access to homes, employment, retail, leisure and other facilities;*
- *Assist in the creation and maintenance of inclusive, environmentally sustainable communities making the best and most efficient use of previously developed land, buildings and natural resources; Support Breckland’s wider rural economy helping to sustain local services and assist in helping rural communities adapt and grow proportionately to enhance their social and economic sustainability;*
- *Direct jobs and growth towards the most sustainable locations contributing towards the economy and jobs in rural areas, helping to achieve the right balance throughout the District; and*
- *Co-ordinate development with transport provision ensuring good access to existing community facilities, services and open space, together with new facilities and services where necessary.*
- *Consideration of the cumulative impact of development, in particular, the impact on the environment.”*

Assessment

- 8.4 The Proposed Development comprises essential infrastructure to support the existing National Grid Substation and wider electricity system by providing stability to the grid. The Greener Grid Park will reduce the reliance of the national grid on coal and gas to provide inertia and support the move to renewable and low carbon energy sources. This will help to reduce the carbon emissions footprint in Breckland and meeting the ‘Net Zero’ carbon emissions targets for the UK.
- 8.5 Furthermore, it is notable that the pre-application advice received from the Council (3PE/2022/0121/PEA, 26 July 2023) stated that the principle of development is considered acceptable in accordance with the relevant policies of the Breckland Local Plan and the NPPF.
- 8.6 The Proposed Development will not have an adverse effect on the characteristics and features of the proposed location as a result of the siting, design, layout, type of installation and materials used, public amenity, or any other sensitive receptors, as set out in the remainder of this chapter.
- 8.7 In light of the above it is considered that the principle of the Proposed Development is supported by planning policy.

Development in the Countryside

Policy Summary

- 8.8 **GEN 03** (Settlement Hierarchy) states that *“Most new development needs will be met through the proposed sustainable settlement hierarchy”*.
- 8.9 **GEN 05** (Settlement Boundaries) states that *“Outside the defined settlement boundaries, development is restricted to recognise the intrinsic character and beauty of the countryside. Development outside the defined settlement boundaries will only be acceptable where it is compliant with all relevant policies set out in the development plan”*.
- 8.10 **EC 06** (Farm Diversification) sets out requirements for farm diversification on existing farm-holdings.

Assessment

- 8.11 It is noted the Site is located outside of any defined settlement boundary. The location of the Site has been selected due to its proximity to the existing Substation where there is an identified need for energy management. The need for the Proposed Development is covered earlier in this report while an Alternative Site Assessment justifying the specific location of the Site is submitted as part of this application. The Proposed Development also represents a form of farm diversification.
- 8.12 The principle of energy related development is already well-established by the existing substation and the approved on-shore infrastructure relating to the Vattenfall DCO projects. Furthermore, it is considered that this type of energy related development is generally less suitable within built-up, urban areas. This was acknowledged in the Council’s pre-app response which stated that it is unlikely that a site of this scale within the required proximity to an existing substation could be found within a settlement boundary where any effects could be suitably mitigated.
- 8.13 The Site is located on Subgrade 3a (good quality) agricultural land, as demonstrated by the Agricultural Land Classification Survey submitted as part of this application, which is Best and Most Versatile (‘BMV’). This also demonstrates that the agricultural land around the Substation is a mixture of Grade 2 and Subgrades 3a and 3b. While the Site manages to avoid Grade 2 land, it is not possible to locate the Site on Subgrade 3b land due to its shape and other factors. For example, the different sections of Subgrade 3a and 3b land are in each case irregular shaped parcels of land which do not follow field boundaries, rendering it close to impossible to locate the Proposed Development entirely within Subgrade 3b land, particularly when other constraints are taken

account of. The reasoning for the selection of the Site is set out in the Alternative Site Assessment submitted as part of this application.

- 8.14 Other sections of this chapter set out how the Proposed Development is compliant with specific, relevant development plan policies.
- 8.15 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to development in the countryside.

Landscape and Visual

Policy Summary

- 8.16 **ENV 05** (Protection and Enhancement of the Landscape) states that *“Development proposals will be expected to contribute to and where possible enhance the local environment by recognising the intrinsic character and beauty of the countryside. Development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, including a consideration of individual or groups of natural features such as trees, hedges and woodland or rivers, streams or other topographical features.*

Development proposals will have regard to the findings of the Council's Landscape Character Assessment (LCA) and Settlement Fringe Landscape Assessment. Development should also be designed to be sympathetic to landscape character.”

Assessment

- 8.17 A Landscape and Visual Appraisal ('LVA') has been submitted as part of this application. The LVA has assessed the potential effects of the proposed development on landscape and visual receptors, taking into account embedded mitigation. The LVA also sets out the mitigation and enhancement measures included as part of the Proposed Development and illustrates them at Appendix E.
- 8.18 With regards to effects on landscape character within the study area, the LVA concludes although at Year 1 there will be moderate adverse impacts on North Pickenham Plateau. However, after Year 15 these will be reduced to minor-moderate adverse impacts, while there would be negligible impact on Beeston Settled Plateau and minor adverse impact on River Wissey Settled Tributary Farmland.
- 8.19 With regards to effects on visual receptors, the LVA concludes that at Year 1 there will be moderate adverse effects for recreational users of Lodge Lane Byway. However, after Year 15 these will be reduced to minor-moderate comprising both adverse and beneficial elements. No other receptors would have effects worse than minor-moderate adverse at Year 15, with properties on St Andrew

Lane receiving entirely beneficial effects and motorists on St Andrews Lane benefitting from some beneficial elements.

- 8.20 As mentioned above, computer generated images from the north and south of the Site showing the Proposed Development in situ can be found at Appendix 2 of this report, demonstrating how the proposed landscaping will look after 0 years, 5 years and 15 years.
- 8.21 The LVA also considered cumulative effects. It found no additional cumulative effects on landscape character in the study area. With regards to cumulative effects on visual receptors, it found no additional cumulative effects on a number of receptors, a mixture of minor beneficial and adverse effects at other receptors (and minor-moderate beneficial effects at once receptor).
- 8.22 In light of the above and the significant benefits of the scheme it is considered that the Proposed Development is in compliance with planning policy related to landscape and visual impact.

Scale, Appearance and Design

Policy Summary

- 8.23 **COM 01** (Design) states that developments must meet a specification that contributes to the distinctive character and amenity of the local area. Development must meet all the below criteria in order to be considered acceptable:
- a) *“Preserves or enhances the special character of the historic environment, and complements the district’s heritage assets, in accordance with policy ENV 07 & ENV 08;*
 - b) *Integrates to a high degree of compatibility with the surrounding area, in terms of: layout, form, style, massing, scale, density, orientation, materials, and design, in order to reinforce the positive and distinctive local character and amenity as described in the Breckland Historic Characterisation Study (2017);*
 - c) *Incorporates sustainable design and durable construction, observing best practice in energy efficiency and climate change mitigation, and is accessible and adaptable to different activities and land uses and the changing needs of all, including disabled and older people;*
 - d) *Consists of high quality details and materials that respects or improves local character;*
 - e) *Responds appropriately to, and is completely integrated with, the existing layout of buildings, surrounding streets, open spaces and patterns of development. The layout of new development should create direct, recognisable, through routes that improve legibility and movement through places, and positively contribute to street frontages;*

- f) Ensures that high quality hard and soft landscaping is integral to layout and design, and opportunities to introduce green urban design solutions are optimised. Specifically, development proposals should respond to: i) landform; ii) levels, slopes and the fall from the ground; iii) trees on and close to the site; iv) natural boundary features; v) the biodiversity of the site and its context; and vi) maximise the use of permeable surfaces;*
- g) Is designed to reduce opportunities for crime and antisocial behaviour, creating safe, secure and accessible environments;*
- h) Provides an appropriate level of amenity for buildings, as outlined in HOU 06;*
- i) Provides high standards of accommodation for housing in terms of size, quality and arrangement of internal space, external private and external communal amenity space, and access to usable open space;*
- j) Creates clear distinctions between private and public space, and integrates building services equipment and facilities in a well-planned manner;*
- k) Requires development to provide appropriate facilities for refuse, recycling and servicing;*
- l) Preserves key and important views, as illustrated in the Breckland Historic Characterisation Study (2017);*
- m) Does not compromise highway safety, enabling safe access for vehicles and for walking and cycling;*
- n) Provides adequate parking as outlined in TR 01 and consideration of safe storage for bicycles;*
- o) Development should be designed to reduce the impact on local air quality, particularly from road traffic, especially in those areas in or likely to impact on, areas identified as 'at risk' of exceeding air quality objectives*

In some cases the Council will request the involvement of a developer funded Design Review, subject to viability."

8.24 **GEN 02** (Promoting High Quality Design) requires developments to achieve a high quality design by

- Respects character of the area and has positive contribution in the context of its location.
- Contributes to the public realm and protects quality of life resulting in Breckland being a vibrant area.
- Buildings, places and streets should be sustainable and high quality.

- Maximising connectivity including high quality and safe pedestrian and cycle routes.

Assessment

- 8.25 Information on the scale, appearance and design of the Proposed Development can be found in sections 4 (Proposed Development), 5 (Design Approach) and 6 (Design Components) of this report, along with the submitted plans.
- 8.26 The Proposed Development has been designed so as to practically fulfil its purpose of stabilising the grid. However, it has also been designed as far as possible to avoid adverse impacts by ensuring sensitive siting and layout which is compatible within its location, together with improving the quality of the area by introducing landscape and biodiversity enhancements. Details of this can be found in the submitted Landscape and Visual Appraisal.
- 8.27 The Proposed development is high quality, safe and a significant contributor to solving the issue of climate change. Furthermore, the Applicant has taken every opportunity to mitigate the impact of the Proposed Development on the built and historic environment, and where possible, enhance these environments.
- 8.28 Buildings would be appropriately coloured (in a recessive colour such as moss green) to minimise any visual impact and comply as far as practicable with the local vernacular. Furthermore, cabling between rows of panels, inverters and the grid connection point would be underground at a prescribed depth, meaning that there would be no requirement for over ground cabling and/ or additional pylons, and therefore there would be no visual impact associated with this approach.
- 8.29 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to scale, appearance and design.

Biodiversity

Policy Summary

- 8.30 **ENV 01** (Green Infrastructure) states that *“New developments will be expected to exploit opportunities to incorporate green infrastructure and enhance existing connectivity; recognising the intrinsic value of the green infrastructure network and ensuring that the functionality of the network is not undermined as a result of development.*

Through its layout and design, new development should respond to the location of existing green infrastructure and support appropriate uses and functions. Where it is considered that the development will have a detrimental effect on the quantity or function of existing green infrastructure, compensatory provision will be required in the form of new and/or enhancements to

the existing green infrastructure. Where appropriate, the Council will seek to secure through planning obligations provision for the future management and/or maintenance of green infrastructure, in accordance with Policies ENV 04 and INF 02. Developments that fail to exploit opportunities to integrate and enhance the existing local green infrastructure network will not be favourably considered.

Development proposals should also have regard to Council endorsed strategic green infrastructure strategies and made neighbourhood plans when considering opportunities on site to provide connections and linkages with the wider network of green infrastructure.

The absence of a detailed green infrastructure strategy for an area should not prevent the consideration of opportunities for linking strategic green areas at a higher level when preparing development proposals. As a starting point, green areas in the local vicinity of a site including designated areas of open space (in line with policy ENV 04), local green space designations, Public Rights of Way and areas protected by environmental designations should be identified to explore possible opportunities for improving connectivity between sites, where appropriate, and in the context of balancing other planning considerations for the site.”

8.31 **ENV 02** (Biodiversity protection and enhancement) states that “*Development likely to have an adverse effect (either directly or indirectly) on a site of national, regional or local biodiversity, or geological interest, as identified on the Policies Map, will not be permitted unless:*

- a. it can be clearly demonstrated that there are reasons for the proposal that outweigh the need to safeguard the special ecological / geological interest of the site, and;*
- b. it has been demonstrated, where development would result in significant harm, that it cannot be reasonably located on an alternative site that would result in less or no harm, and;*
- c. residual harm, after all measures to prevent and adequately mitigate have been applied, will be adequately compensated for.*

Where the Council considers that a designated site, protected species or any species or habitat, particularly where listed as a Priority Habitat or Species under Section 41 of the Natural Environment and Rural Communities Act (2006), may be adversely affected by a development proposal, an ecological assessment (EclA) will be required to be submitted with the planning application to assess effects on flora and fauna, commensurate with the scale of the impact and the importance of the species.

In accordance with the stepwise approach to protecting biodiversity (the mitigation hierarchy), all development with the potential to affect biodiversity should demonstrate how such effects have been considered, by firstly demonstrating how effects have been avoided, and then how effects that cannot be avoided have been minimised. Residual harm, after all measures to prevent and adequately mitigate have been applied, must be adequately compensated for.

All development should demonstrate how net gains for biodiversity are being secured as part of the development, proportionate to the scale of development and potential impacts (if any).

Where development is permitted, the authority will consider the need for conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation and / or geological interest. Wherever a proposed development may have a detrimental impact upon a designated site or protected species, appropriate conditions and/or planning obligations will be used to ensure that the appropriate mitigation measures incorporated within the proposal are fully implemented, and monitored where required."

- 8.32 **ENV 06** (Trees, Hedgerows and Development) states that "Trees and significant hedge and shrub masses form part of the green infrastructure network and should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition, or there are exceptional and overriding benefits in accepting their loss."

[..]

Where a proposed development retains existing trees and hedgerows on-site, Breckland Local Plan (Adoption Draft) November 2019 189 or where development occurs within a tree root protection area, provision must be made for their care and protection throughout the duration of the development with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees. To ensure that tree cover and habitat is retained, it is important that both the short term and long term impacts that a development may have on trees is evaluated at the earliest opportunity. Accordingly the Council may require that a Tree Survey, Arboricultural Impact Assessment, Tree Protection Plan and Method Statement be undertaken by a suitably qualified professional in accordance with BS5837:2012."

Assessment

- 8.33 An Ecological Assessment Report is submitted as part of this application following the carrying out of a number of ecological surveys.

- 8.34 It identified three statutory and non-statutory designations within influencing distance of the Site. However, it is not anticipated that there will be any detrimental impacts on these designations as a result of the proposed development due to the consideration of ecological constraints during the design process and the proposed measures outlined to protect and enhance biodiversity within the Site.
- 8.35 The main habitats within the development footprint are arable farmland which are widespread and generally of low value to wildlife. Habitat enhancement measures are proposed as part of the development and will serve to enhance the development for local biodiversity. Enhancement measures include the planting of hedgerow screening and creation of woodland and scrub creation. The proposed development will result in a net gain of 13.49% Habitat Units and 86.45% Hedgerow Units.
- 8.36 Standard measures to ensure runoff control and pollution prevention will be implemented; these measures will safeguard statutory and non-statutory designated sites and terrestrial habitats within the Site and the wider environment.
- 8.37 The Site offers minimal suitable habitat for reptiles and amphibians. A small section of hedgerow (c. 25m) will be removed and later replaced and a 10m section of species-poor hedgerow will be permanently removed to accommodate the permanent access track. Amphibian surveys are suggestive of there being no great crested newt present in the local area, though field boundary habitats offer potential suitable habitat for both amphibians and reptiles. Newly created linear hedgerow habitats, woodland and scrub will provide terrestrial foraging and hibernation habitat for reptiles and amphibians. Reasonable Avoidance Measures (RAMs) will be implemented to minimise risk of harm to individual animals.
- 8.38 Several mature trees are present adjacent to the Site, however no trees were observed within the Site and/or identified for removal to have any bat roost potential. Field and woodland boundary habitats offer moderate foraging and commuting habitats, however the dominating habitat, cereal crops, offers low foraging and commuting potential. The proposed development also provides positive measures for bats, through the enhancement of hedgerows, creation of hedgerows, woodland and scrubland within the Site. Any lighting required during construction and/or operation of the Greener Grid Park should be directed away from adjacent woodlands.
- 8.39 The arable farmland habitat that dominates the Site offers minimal habitat for the majority of species recorded during breeding bird surveys that generally favour field boundary habitats. Ground-nesting species including skylark were recorded within the arable farmland and there will

be minor anticipated habitat loss for this species. The proposed development also provides positive measures for breeding birds, through enhancement and maintenance of hedgerows, woodland trees and scrubland.

- 8.40 Removal of nesting bird habitats should be undertaken outside of the bird breeding season (01 March to 31 August inclusive). If vegetation works are necessary during the breeding season, suitable nesting habitat should be searched by a suitably experienced ecologist prior to works commencing. Only when the ecologist is satisfied that no offence will occur under the legislation will works be permitted to proceed.
- 8.41 No evidence of badgers was found on the Site but this species could be present within the locality. A pre-construction inspection of the Site for badger will be undertaken to identify any newly created setts. No trenches or excavations will be left open overnight; these will be back-filled or covered to avoid entrapment of badgers during construction.
- 8.42 The adjacent woodland may be utilised by Western hedgehog and open arable fields are used by brown hare. Security fencing located around the Site perimeter will have sufficient gaps positioned at several locations along the base of fences in order to allow Western hedgehog and brown hare to continue to use the habitats on Site during the operational period. The measures outlined for badgers and reptiles will also be of benefit to hedgehog. Planting of hedgerows, woodland and scrub will also benefit hedgehogs and brown hare.
- 8.43 An Arboricultural Impact Assessment was submitted alongside this application. It notes that there will be temporary loss of trees for the temporary access, which can then be replanted, as well as the loss of a short section of hedgerow for the permanent access, which is found to be insignificant. There may also be the loss of a small section of hedge for the cable which would be an insignificant loss if not possible to replant.
- 8.44 It also finds that once the tree removals have been undertaken and the protection barriers installed, there will be very limited potential for impacts to occur to retained trees. The only location where some small trees may be impacted is where the proposed cable route if the cable alignment cannot be locally adjusted on site to avoid the removal of any trees then (due to their young age and small size) the trees can be transplanted elsewhere on site or replanted over the cable once it is installed (if permissible).
- 8.45 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to biodiversity.

Traffic and Transport

Policy Summary

8.46 **TR 01** (Sustainable Transport Network) states that the Council will promote a safe, efficient and convenient sustainable transport system through:

- a) *“supporting improvements to the road and rail connections both within the District and to the wider area;*
- b) *locating development so as to ensure wherever possible, new development is accessible to sustainable modes of transport and makes provision for improved public transport;*
- c) *promoting improved access to, and interchange between, all modes of transport to key settlements and town centres;*
- d) *reducing the need to travel by private car in towns and villages and increasing the proportion of shorter journeys made on foot or cycle; thereby providing a genuine alternative to the car and helping to facilitate a modal shift and commensurate reduction in carbon emissions; and*
- e) *promoting and improving safety, security and healthy lifestyles by encouraging walking and cycling, creating and improving links to existing routes and, for new developments, ensuring the provision of facilities such as secure, accessible bicycle parking with changing facilities on site.*

Development should:

- *seek to minimise the need to travel;*
- *promote opportunities for sustainable transport modes;*
- *not adversely impact on the operation or safety of the strategic road network;*
- *improve accessibility to services; and support the transition to a low carbon future.”*

8.47 **TR 02** (Transport Requirements) states that developments should have flexibility of travel modes for all users. It will be favoured if proposals include the below:

- *“integrate satisfactorily into existing transport networks;*
- *mitigate impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development, through the provision of, or contributions*

towards, any relevant transport improvement deemed to be necessary, including those secured by legal agreement;

- *protect, and where possible enhance, access to public rights of way;*
- *provide safe, suitable and convenient access for all users, including appropriate parking and servicing provision in terms of amount, design and layout (Appendix 2 provides a starting point); and*
- *avoid inappropriate traffic generation and do not compromise highway safety.*

Major development proposals should include an assessment of the impacts of new development on the existing transport network; and demonstrate how they will maximise connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes. Where potential transport impacts are identified, developers will be expected to produce Transport Assessments to assess the impacts and identify appropriate mitigation, together with Travel Plans where appropriate."

Assessment

- 8.48 The Transport Statement and Construction Traffic Management Plan has considered the likely impact of traffic generated by the proposed development on the local road network.
- 8.49 Construction of the proposed development will generate approximately 66 movements vehicle movements per day at the peak of construction. It is expected that during the peak month of construction (Month 2), 52 two-way HGV movements per day will occur per day. A further 14 car / LGV trips would be created by construction staff travelling to and from the site.
- 8.50 The increase in traffic generation due to construction traffic was calculated using baseline traffic data from the DfT and was found that the impact of construction traffic on the A47 is not significant. On this basis, the impact on traffic generation due to construction is therefore negligible.
- 8.51 The construction phase would be accessed by a temporary Left In / Left Out junction that would be removed following the completion of construction activities at the site. Thereon the site would be accessed from the existing substation access junction.
- 8.52 Traffic management procedures have been proposed within this report which would ensure the safe operation of the approach route to the site during construction. Determination of the final details of these traffic management measures will occur once the BoP contractor has been appointed and can be secured via an appropriately worded planning condition.

8.53 The proposed development will not be manned, operational traffic is expected to be minimal and would be conducted by smaller vehicles. The impact of this on the wider road network will be negligible.

8.54 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to traffic and transport.

Flood Risk and Drainage

Policy Summary

8.55 **ENV 09** (Flood Risk & Surface Water Drainage) the policy states that all new development should:

- *“be located to minimise the risk of flooding, mitigating any such risk through design and implementing sustainable drainage (SuDS) principles.*
- *incorporate appropriate surface water drainage mitigation measures to minimise its own risk of flooding and should not materially increase the flood risk to other areas. Particular care will be required in relation to habitats designated as being of international importance in the area and beyond which are water sensitive, as well as habitats designated of regional or local importance.*

Developers will be required to show that the proposed development would:

- not increase green field run off rates and vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows;*
- wherever practicable, have a positive impact on the risk of surface water flooding in the surrounding area adjacent to the development; and iii) address potential impact of infiltration upon groundwater Source Protection Zones and/or Critical Drainage Catchments.*

This will be minimised through the installation of infiltration and attenuation measures to dispose of surface water in accordance with sustainable drainage system (SuDS) principles and the refinements to, and evolution of, the technical evidence base and guidance (as may be updated and superseded over the life of this Plan).

In the case of major development on unallocated sites, if the sequential test shows that it isn't possible to use an alternative site, the applicant will need to submit an additional exception test in line with national policy on Flood Risk Assessments.

All applications should reflect best practice and the Lead Local Flood Authority (LLFA) guidance, and any updated version (currently April 2017) providing the appropriate information required to assist in the determination of such application as issued by the LLFA. This includes the requirement to provide details of means of adoption and maintenance of the systems over the lifetime of the development at the pre-application stage. In adherence with this guidance, drainage strategies must also consider the potential increase in the volume of run-off from a development as a result of increases in the area of impermeable surfaces. Although run-off rates may be restricted to equivalent greenfield rates, the duration over which the site could discharge at this rate is likely to increase.”

Assessment

- 8.56 Motion was commissioned to undertake a Flood Risk Assessment and Drainage Strategy which is submitted as part of this application.
- 8.57 The nearest main river to the Site is a River Wissey which runs in a westerly direction approximately 2km south of the Site. The nearest watercourse to the Site is a tributary of the River Wissey which runs about 100m from the Site’s southern boundary. The Site is located entirely in Flood Zone 1, the area at lowest risk of flooding.
- 8.58 The site is considered to be low risk of flooding from rivers and sea, surface water, ground water, Infrastructure Failure and artificial sources.
- 8.59 In order to attenuate the additional surface water from the development it is proposed to have an attenuation pond which covers an area of 582m² and a depth of 1m. The surface water will be restricted by a hydrobrake to 5.2l/s which is the Qbar greenfield runoff rate for the site. The ground treatment will be crushed stone and 300mm type 3 subbase which will be used as attenuation storage on site.
- 8.60 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to flood risk and drainage.

Contaminated Land

Policy Summary

- 8.61 **CM 01** states that *“In assessing the impact of development on the living conditions of occupants, regard will be had to ... contaminated land”*.

Assessment

- 8.62 ITP Energised were instructed to undertake a Phase 1 Geo-Environmental Desk Study for the Proposed Development which is submitted as part of this application. The assessment was undertaken through a desk-based study of freely available environmental data, and an Envirocheck Report as well as conducting a Site walkover.
- 8.63 Based on a review of historic mapping and environmental records pertaining to the Site, the Site comprised agricultural land from the earliest available mapping (1883) through to 2016 when an access road was implemented in the northern area of the Site. The access road is a tarmac pathway leading from the main road (A47) to a substation located north of the main development area of the Site. Mapping suggests that the southern area of the Site and the land around it have remained greenfield through to present day.
- 8.64 No significant contaminant sources have been identified from onsite activities, however potential offsite contaminants cannot be discounted, though the risk is considered low.
- 8.65 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to contaminated land.

Historic Environment

Policy Summary

- 8.66 **ENV 07** (Designated Heritage Assets) states that designated heritage assets should be conserved and if possible enhanced. If heritage assets are at risk of being affected then it will be required to provide evidence to the asset's importance, identifying any significance. Should development affect the heritage asset then a comprehensive assessment will be required. If the setting or character of a Listed Building will be impacted, then consideration should be given to "the protection, conservation and potential enhancement of any features of historic or architectural interest; including within the curtilage of a listed building that predates 1st July 1948."

Assessment

- 8.67 An Archaeology and Heritage Statement has been submitted as part of this application which has been undertaken with due respect to guidance published by Historic England and with the utilisation of terminology in full accordance with the National Planning Policy Framework, and describes the significance of designated and non-designated heritage assets potentially affected by the proposals.

- 8.68 The Site contains no designated heritage assets. In respect to designated assets within the vicinity of the Site has been concluded there would be no harm to their significance as a result of the scheme.
- 8.69 Considering the archaeological record there is a low potential for medieval agricultural/land management remains and high potential for post medieval agricultural/land management remains. These remains are predicted to be of low significance and likely associated with those found previously to the north of the Site.
- 8.70 Overall, there is no evidence for archaeological remains of high (national) significance to be present within the Site. As such there is no evidence to reasonably indicate the potential for the presence of archaeological remains which would preclude development. Therefore, it is anticipated that archaeological fieldwork, if required, could be delayed as a condition to consent for any forthcoming application.
- 8.71 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to the historic environment.

Public Amenity

Policy Summary

- 8.72 **COM 02** (Healthy Lifestyles) states that *“New development will be expected to take appropriate steps to avoid/mitigate potential negative effects on the health of the population and facilitate enhanced health and well-being through the provision of conditions supportive of good physical and mental health.”*
- 8.73 **COM 03** (Protection of Amenity) aims to protect residential amenity of neighbouring occupants. The living conditions of occupants will need to be considered, the below will therefore need to be accounted for:
- 1) *“The protection of adequate areas of usable and scheduled private amenity space for the occupiers of existing dwellings;*
 - 2) *The provision of adequate areas of usable and secluded private amenity space for the occupiers of proposed dwellings, in keeping with the character of the immediate surrounding areas;*
 - 3) *Overlooking of windows of habitable rooms and private amenity space;*
 - 4) *Overbearing impact/visual dominance;*
 - 5) *Overshadowing of private amenity space;*

- 6) *Loss of daylight and/or sunlight to existing windows of habitable rooms;*
- 7) *Odour, noise, vibration or other forms of nuisance such as artificial light pollution, insects and vermin; and*
- 8) *Other forms of pollution (including contaminated land, dust, air pollution, for example the emission of particulates etc)."*

Assessment

- 8.74 The Proposed Development is set away at such a distance from sensitive receptors that it will not impact any existing private amenity space or cause any form of pollution that will impact these receptors during operation, as was highlighted in the Council's pre-app response. In order to mitigate any potential for impacts during the construction of the Proposed Development an Outline Construction Environmental Management Plan has been submitted as part of this application.
- 8.75 Nevertheless, an Environmental Noise Assessment has been submitted as part of this application. As part of this assessment, TNEI has produced a noise propagation model in accordance with ISO 9613 based on candidate plant typical for this type of development. Quantitative assessments confirmed that operational Specific Sound Levels of the Proposed Development and BS 4142 Rating Levels of operational noise from the Proposed Development would not exceed fixed levels introduced by Breckland Council for other developments in the area. During both the daytime and night-time, Rating levels from the Proposed Development would be well below the representative background noise levels at all receptors.
- 8.76 Furthermore, a cumulative assessment (which considered the onshore operational noise immissions from both the Norfolk Vanguard Offshore Wind Farm and the Norfolk Boreas Offshore Wind Farm developments) was undertaken against both the fixed Broadband and 100 Hz noise limits. Negligibly small exceedances of the 100 Hz noise limit were found at a number of receptors, whilst an exceedance of the Broadband limit was identified at a single Noise Assessment Location (NAL03). However, the exceedance at this location is entirely attributable to the combined immission level of the Vanguard and Boreas developments, as the immission level from the Proposed Development was found to be negligible when the two were logarithmically added.
- 8.77 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to public amenity.

9.0 SUMMARY AND CONCLUSIONS

- 9.1 The Proposed Development comprises the construction and operation of a Greener Grid Park and other associated infrastructure located on land to the south of Necton Substation, to be known as 'Necton GGP'.
- 9.2 The principle of electricity infrastructure to support the grid and allow for stability in electricity supply as we move to a low carbon electricity system dominated by intermittent renewable energy sources is strongly supported by local and national planning policy. Furthermore, the UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050 as well as strengthening the UK's security of supply. There is therefore a significant and demonstrable need for the Proposed Development. Furthermore, it is important to note that Necton GGP is one of the SPP3 projects specifically awarded by National Grid ESO as part of their strategy to deliver long-term stability for the national electricity network.
- 9.3 The Applicant undertook Pre-Application Consultation and more information on this can be found within the Consultation Statement submitted as part of this planning application.
- 9.4 It has been demonstrated that the Proposed Development complies with planning policy and there are significant benefits associated with it. The environmental and technical reports that form part of the planning application submission demonstrate that there would be no unacceptable environmental impacts, and there are a number of added benefits, including biodiversity gains and beneficial landscape effects at certain receptors.
- 9.5 These factors, when combined with the significant need for renewable energy, mean that the planning balance (and, in particular, when considered in the context of the tests under Section 38(6) Planning and Compulsory Purchase Act 2004) is weighted significantly in favour of the Proposed Development.
- 9.6 The Applicant therefore respectfully requests that planning permission is granted for the Proposed Development.

APPENDIX 1: LIST OF PLANS

No.	Reference	Title
1	SP-01	Site Location Plan
2	SP-02	Block Plan (Main Site)
3	SP-03	Block Plan (Biodiversity Net Gain)
4	PL-01	Existing Site Plan
5	PL-02	Existing Site Plan (Detail)
6	PL-03	Site Layout Plan
7	PL-03.1	Site Layout Plan (Without Construction Access)
8	PL-04	Site Layout Plan (Detail)
9	PL-05	Drainage Detail Plan
10	EL-01	Existing Site Sections
11	EL-02	Proposed Site Sections
12	SD-01	Comms House
13	SD-03	Emergency Generator
14	SD-03.1	Emergency Generator
15	SD-04	Offices (Main Site)
16	SD-04.1	Offices (Main Site)
17	SD-04.2	Offices (Temp Construction Access)
18	SD-04.3	Offices (Temp Construction Access)
19	SD-05	Stores
20	SD-06	Cooler
21	SD-07	SC Building
22	SD-08	Aux Transformer
23	SD-09	Cooler II
24	SD-10	Control Containers
25	SD-11	HISC Building
26	SD-13	CCTV Lighting Post
27	SD-14	Palisade Fence and Security Gate
28	SD-16	HY Yard and Transformer
29	SD-17	Weldmesh Fencing
30	SD-18	Circuit Breakers & Auxiliary Transformer

APPENDIX 2: VISUALS

VIEW A

YEAR 0



VIEW A

YEAR 5



VIEW A

YEAR 15



VIEW B

YEAR 0



VIEW B

YEAR 5



VIEW B

YEAR 15

