

AGENDA ITEM NO: 9/2(b)

Parish:	Walpole	
Proposal:	Erection of a Renewable Battery Energy Storage System and associated infrastructure including access and landscaping.	
Location:	Land Opposite Walpole Sub Station Walpole Bank Walpole St Andrew Norfolk PE14 7JE	
Applicant:	Field Devco Ltd	
Case No:	22/02021/FM (Full Application - Major Development)	
Case Officer:	Mr K Wilkinson	Date for Determination: 7 February 2023 Extension of Time Expiry Date: 7 July 2023

Reason for Referral to Planning Committee – at the discretion of the Assistant Director of Environment and Planning and the views of the Parish Council are contrary to the officer recommendation.

Neighbourhood Plan: No

Case Summary

This application is for the installation of a Battery Energy Storage System (BESS) approx. 350m to the east of Walpole Bank opposite from the Walpole Substation on an irregular shaped parcel of 1.1ha of agricultural land.

Primary access to the site would be off Folgate Lane to the east and there is a strip of land parallel to the northern side of Folgate Lane approx. 800m in length, plus a connection to a land drain to the south of the site. There are two BESS proposals adjoining Walpole Bank – one already approved under application ref: 22/00438/FM and a further current proposal under ref: 22/02265/FM (Henry Energy Limited) which is pending decision and reported elsewhere in this agenda. This proposal would be undertaken separately from those other schemes; however an emergency access is also proposed connecting to Walpole Bank to the west via those sites.

The site lies between two overhead power lines suspended between pylons to the north and south, but not oversailing the development proposed.

The BESS would store excess electricity at times of low demand and then release it back into the grid when required at peak times. It would be rated at up to 100MW and would therefore be capable of serving the needs of over 280,000 homes for one hour if required.

It is anticipated that the proposed development would be operational for a period of twenty five (25) years to correspond with the adjacent BESS facilities.

The site is located outside of the development boundary for Walpole St Andrew/Walpole St Peter/Walpole Marsh, and is therefore in an area classed as 'countryside'.

The site is arable grade 1 agricultural land and in an area at high risk of flooding (Flood Zone 3A and Tidal Hazard Mapping Zone).

The BESS is considered to be 'associated infrastructure' in relation to the management and use of energy and the National commitment to carbon neutrality by 2050. It should therefore be considered in the context of Policies DM2 and DM20 of the Development Plan accordingly.

Key Issues

- Principle of development
- Impact upon countryside
- Loss of high-quality agricultural land
- Flood risk implications
- Highway issues
- Ecology and biodiversity
- Impact on neighbour amenity
- Fire safety
- Other material considerations

Recommendation

APPROVE

THE APPLICATION

This application is for the installation of a Battery Energy Storage System (BESS) approx. 350m to the east of Walpole Bank opposite from the Walpole Substation on an irregular shaped parcel of 1.1ha of agricultural land.

Primary access to the site would be via a track off Folgate Lane to the east and there is a strip of land parallel to the northern side of Folgate Lane approx. 800m in length, plus a connection to a land drain to the south of the site. There are two BESS proposals adjoining Walpole Bank – one already approved under application ref: 22/00438/FM and a further current proposal under ref: 22/02265/FM (Henry Energy Limited) which is pending decision and reported elsewhere in this agenda. This proposal would be undertaken separately from those other schemes; however an emergency access is also proposed connecting to Walpole Bank to the west via those sites - although the applicant has confirmed the emergency access would be brought forward independently prior to first use of the facility if these other schemes have not been developed..

The site lies between two overhead power lines suspended between pylons to the north and south but not oversailing the development proposed.

The BESS would store excess electricity at times of low demand and then release it back into the grid when required at peak times. It would be rated at just over 100MWh and would therefore be capable of providing a 50MW output over a 2-hour period.

The site is located outside of the development boundary for Walpole St Andrew/Walpole St Peter/Walpole Marsh, so is therefore in an area classed as countryside. However, it is acknowledged that the site lies approx. 350m away from the Walpole Substation to the west

and abuts similar facilities - the roadside one having the benefit of existing planning permission.

The site is arable grade 1 agricultural land and in an area at high risk of flooding (Flood Zone 3A and Tidal Hazard Mapping Zone). There is significant apparatus associated with National Grid in the vicinity of the site.

The proposed development consists of:

- 25 sets of battery racks each containing 25 battery storage units amounting to a total of 625 units. Each set has a finished height of 2.7m and sits on a concrete plinth, raised approximately 0.3m above ground level. The BESS would have an installed capacity of up to 100 megawatts (MW);
- Battery inverters;
- Transformers;
- 132kV Distribution Network Operator (DNO) substation;
- Customer substation;
- 2.4m high steel palisade fence surrounding the site;
- 3.5m high timber acoustic fence;
- CCTV monitoring / lighting column poles (7 in total, each 4m high);
- A new dedicated access track from the east connecting to Folgate Lane, with a gated entrance;
- Limited parking (4 spaces) for maintenance vehicles;
- A surface water attenuation pond in the south-west corner;
- Landscaping and biodiversity net gain provision; and
- Secondary dedicated emergency vehicle access route from Walpole Bank.

The application is accompanied by a Planning Statement, Preliminary Ecological Appraisal, Noise & Vibration Impact Assessment, Landscape & Visual Impact Assessment, Construction Transport Management Plan, Contaminated Land Report, Battery Fire Safety Management Plan, Drainage Statement, Flood Risk Assessment & Design and Access Statement.

SUPPORTING CASE

The agent has submitted the following statement in support of this application:

“There is a clear national imperative to support decentralised energy and infrastructure to enable a transition to renewable and low carbon energy networks to achieve net zero emissions, build a strong UK renewable energy sector, and stabilise energy pricing to bring down the cost of living. Battery Energy Storage Systems (BESS), such as the one proposed, are an important part of the solution.

Over the next decade East Anglia could see electricity generation increase four-fold. In the wider East of England region, large amounts of low carbon generating infrastructure, predominantly wind, are expected to connect to the grid. National Grid’s future energy scenario modelling shows that transmission-connected generation could triple compared to the current 8GW of transmission-connected generation in the region. These increases will place significant pressure on the grid network.

The benefits of battery storage are significant. The proposed BESS (100MW) by Field Devco Ltd will:

i increase the resilience of power supply by adding to the grid storage capacity;

- ii enable a greater reliance upon renewable sources of energy through the provision of backup facilities, taking power from the grid when available and releasing it during peak demand when renewable sources are unable to generate sufficient electricity; and
- iii provide security during unplanned outages from other energy generators.

The BESS therefore represents a central tool to improve the capacity and resilience of the network as part of a more actively managed, more decentralised system.

Locating the facility near to Walpole Substation is essential to avoid inefficient transmission losses and provide a responsive, reliable supply. The grid connection must also have capacity to accept the connection – Walpole substation has the required capacity and an electrical connection for the BESS has been secured with the Distribution Network Operator, UK Power Networks, and formally accepted by the Applicant. The site therefore represents an appropriate location for the BESS, given the prevailing operational requirements of the facility.

The proposal has a strong alignment with national and local policy objectives that target the Government's sustainable energy ambitions to achieve net zero emissions by 2050. The National Planning Policy Framework (NPPF) is clear that the planning system should support the transition to a low carbon future including supporting renewable and low carbon energy. Local planning policy (adopted and emerging) encourages renewable energy generation and associated infrastructure, with the benefits of this to be weighed against the environmental effects of new development.

The technical reports accompanying the application demonstrate that the proposal will not give rise to any significant environment impacts. The applicant has worked closely with the Council's Planning Team, including preparing a comprehensive landscape scheme that goes well beyond mitigation needed for the development. Additionally, the land will be restored to agricultural use after decommissioning, with the applicant willing to accept a condition to this effect.

Overall, the requirements of the Statutory Development Plan and the overarching aims and objectives of National Planning Policy Guidance and other material national and local guidance have been met – the proposed development being appropriate at this location and bringing with it clear sustainability benefits.”

PLANNING HISTORY

Adjoining sites to the west:

22/00438/FM: Application Permitted: 20/09/22 - Development of an energy storage installation and associated development to allow for the storage, importation and exportation of energy to the National Grid. (Delegated decision)

22/02265/FM: Decision pending: Proposed development of an energy storage installation and associated development to allow for the storage, importation and exportation of energy to the National Grid. (Committee decision – Reported in this agenda)

RESPONSE TO CONSULTATION

Walpoles Parish Council: OBJECT - The site is very close to properties in Folgate Lane which is a single track road and not suitable for HGVs. Battery storage units are not in containers, but are 625 separate units which is totally unacceptable. Where are they going to

connect to and there are already 6/7 sites within a 4 mile circle. Community concerns regarding fire risks, flooding, light pollution and taking up valuable arable land.

Local Highway Authority (NCC): NO OBJECTION subject to conditions relating to access construction, and Construction Traffic Management Plan and Access Route submission and compliance.

King's Lynn Internal Drainage Board: NO OBJECTION - Strongly recommends that Land Drainage Consent is sought from the Board prior to determination of this planning application as byelaw issues apply.

Environment Agency: Comments awaited at the time of writing this report.

District Emergency Planning Officer: NO OBJECTION subject to condition relating to signing up to AW's Flood Warning System, installation of services at high level and preparation of a flood evacuation plan and evacuation routes.

Environmental Health & Housing – Environmental Quality: NO OBJECTION subject to conditions relating to contamination during construction/development plus provision of Electric Vehicle charging facility for future maintenance vehicles.

Environmental Health & Housing – Community Safety & Neighbourhood Nuisance: NO OBJECTION subject to conditions regarding acoustic fencing installation, mitigation measures contained in the Noise and Vibration Impact Assessment, lighting details and hours of construction and deliveries as per the construction transport management plan.

Historic Environment Services: NO OBJECTION subject to conditions relating to archaeological investigations.

Norfolk Fire & Rescue Service: NO OBJECTION subject to the proposal meeting the necessary requirements of the current Building Regulations 2010 – Approved Document B (volume 2 – 2019 edition) as administered by the Building Control Authority plus a condition regarding fire safety measures including installation of a hydrant and emergency access route provision.

Senior Ecologist: NO OBJECTION subject to conditions to secure ecology mitigation measures.

REPRESENTATIONS

A total of **FIFTEEN** items of correspondence received, **OBJECTING** on the following summarised grounds:

- Noise and light impact on the nearby residences
- Food security – loss of high-grade agricultural land
- Impact upon archaeology
- Impact upon character of this locality
- Flood risk
- Green credentials of production of this type of technology
- Fire safety
- National security – terrorist target
- Cumulative impact

- Construction period chaos, HGV vibration on foundation of dwellings and safety on road network
- Loss of habitat

TWO items of correspondence in **SUPPORT** of the proposed development.

LDF CORE STRATEGY POLICIES

CS01 - Spatial Strategy

CS06 - Development in Rural Areas

CS08 - Sustainable Development

CS10 - The Economy

CS11 - Transport

CS12 - Environmental Assets

SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN 2016

DM1 – Presumption in Favour of Sustainable Development

DM2 – Development Boundaries

DM15 – Environment, Design and Amenity

DM17 - Parking Provision in New Development

DM20 - Renewable Energy

NATIONAL GUIDANCE

National Planning Policy Framework (NPPF)

Planning Practice Guidance (PPG)

Powering Up Britain Strategy (2023) Net Zero – The UK's Contribution to Stopping Global Warming Reducing UK Emissions – 2020 Progress Report to Parliament Overarching National Policy Statement for Energy (EN-1)

Draft National Policy Statements EN-1 and EN-3 (2023)

OTHER GUIDANCE

Climate Change Committee: Progress in Adapting to Climate Change 2023 Report to Parliament

PLANNING CONSIDERATIONS

The main considerations are as follows:

- Principle of development
- Impact upon countryside

- Loss of high-quality agricultural land
- Flood risk implications
- Highway issues
- Ecology and biodiversity
- Impact on neighbour amenity
- Fire safety
- Other material considerations

Principle of development:

The site is located within an area defined as the countryside.

Both National and local planning policy and guidance seek to retain the countryside for its amenity value, intrinsic character and beauty and agricultural provision.

Paragraph 174 of the NPPF, 2021 states: *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland...

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans, and ...'

Development Plan Policy CS01 seeks to *protect the countryside beyond the villages for its intrinsic character and beauty, the diversity of its historic environment; landscapes; geodiversity and biodiversity...*

With DPP CS06 expanding upon this by stating that: *'Beyond the villages and in the countryside, the strategy will be to protect the countryside for its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all. The development of greenfield sites will be resisted unless essential for agricultural or forestry needs.'*

However, National and local planning policy and guidance also place significant importance on renewable energy.

Paragraph 155 of the NPPF states: *'To help increase the use and supply of renewable and low carbon energy and heat, plans should:*

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development, and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.'

Paragraph 158 states: *'When determining planning applications for renewable and low carbon development, local planning authorities should:*

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.'

Local Plan Policy CS08 states: *'The Council and its partners will support and encourage the generation of energy from renewable sources. These will be permitted unless there are unacceptable locational or other impacts that could not be outweighed by wider environmental, social, economic and other benefits.'*

Renewable projects should be assessed accordingly (where necessary by project level Habitat Regulation Assessment) to ensure minimal ecological impact and should undergo a detailed cumulative impact assessment.'

Policy DM2 of the SADMPP acknowledges that some development may be required outside of the development boundaries within countryside stating: *'The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including...*

- renewable energy generation (under Policy DM20 of the rural economy or to this Plan)'*

Policy DM20 of the SADMPP states: *'Proposals for renewable energy (other than proposals for wind energy development) and associated infrastructure, including the landward infrastructure for offshore renewable schemes, will be assessed to determine whether or not the benefits they bring in terms of the energy generated are outweighed by the impacts, either individually or cumulatively, upon:*

- Sites of international, national or local nature or landscape conservation importance, whether directly or indirectly, such as the Norfolk Coast Area of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSIs) and Ramsar Sites*
- The surrounding landscape and townscape*
- Designated and non-designated heritage assets, including the setting of assets; ecological interests (species and habitats)*
- Amenity (in terms of noise, overbearing relationship, air quality and light pollution)*
- Contaminated land*
- Water courses (in terms of pollution)*
- Public safety (including footpaths, bridleways and other non-vehicular rights of way in addition to vehicular highways as well as local, informal pathway networks), and*
- Tourism and other economic activity.*

In addition to the consideration of the above factors, the Borough Council will seek to resist proposals where:

a) There is a significant loss of agricultural land; or

b) Where land in the best and most versatile grades of agricultural land (grades 1, 2 and 3a) are proposed to be used.

Development may be permitted where any adverse impacts can be satisfactorily mitigated against and such mitigation can be secured either by planning condition or by legal agreement.'

As such there is some conflict between these two overarching aims (protection of the countryside/high grade agricultural land and provision of renewable energy) and a balance is therefore required.

This application reflects the changes in legislation pertaining to the Nationally Significant Infrastructure Project ('NSIP') regime. In 2020, the UK Government announced that the caps on battery storage capacity for planning applications in England and Wales (50 MW and 350 MW respectively) would be removed. This means a battery storage proposal which exceeds these thresholds will no longer be considered an NSIP, and all applications for battery storage, regardless of their size, will be determined by local planning authorities. This proposal is for a facility with capacity just over 100MW and therefore falls within our remit.

The battery storage installation is being proposed to facilitate a more consistent supply of energy to the National Grid and to consolidate the battery storage capacity close to the existing power station.

The proposed installation may utilise excess power that may be generated at certain times of the day, store this power on-site and then export it back to the National Grid during periods when demand increases.

Whilst not specifically generating renewable energy, the BESS is considered to be 'associated infrastructure' in relation to the management and use of energy and the National commitment to carbon neutrality by 2050. It should therefore be considered in the context of Policies DM2 and DM20 of the Development Plan accordingly.

This will be explored below.

Impact upon countryside

The Landscape Character Assessment produced by Chris Blandford Associates in 2007 and used to inform the Core Strategy, places this site within an area categorised as: The Fens – Settled Inland Marshes – D3: Terrington St John and adjacent to D2: Walpole, Terrington and Clenchwarton.

The application is accompanied by a Landscape & Visual Impact Assessment (LVIA) with 20 representative viewpoints. This considers the development and mitigation measures in the form of landscaping proposals and assesses the likely impact upon the area.

The LVIA concludes that:

“A review of the landscape designations and planning policy at the national, regional and local level has been carried out and there are no landscape ecological or heritage designations which cover the Site or its immediate setting. The Site topography and that of the wider study area is flat. The Site is currently part of a larger arable field parcel with mature hedgerow to the north of the Site.

Open and partial views into the Site are available from portions of Folgate Lane and Walpole Bank in proximity to the Site. At greater distances, further views are truncated by built form or layers of mature vegetation. Where views are available, they are often seen within the context of the built form of the existing energy infrastructure in close proximity to the Site.

The proposed development has been laid out to retain the existing landscape features including the mature hedgerow to the north of the Site, addressing the current local policy. Landscape areas to the south and east of Site will be enhanced with additional tree planting, native shrubs and wildflower meadow. Effects are anticipated to reduce over time as the proposed planting matures.

As with any development, a number of impacts arise. **Minor beneficial** effects are anticipated in relation to vegetation within the Site. **Minor to Negligible adverse** effects are anticipated to landscape character. These effects will be borne in an area that has an existing relationship with the energy infrastructure surrounding the Site and will largely be offset by the new landscape scheme.

Visual effects are anticipated to range from **Minor adverse to Negligible** for a limited number of receptors and are largely limited to those in close proximity to the Site, where the Appraisal Site will form a small portion of the wider view which is currently influenced by the existing energy infrastructure within the local landscape context. Effects are anticipated to reduce over time as the proposed planting adjacent to the Site boundaries matures.

In summary, the proposed development will sit within the existing landscape character without causing significant harm. Whilst some negative landscape and visual effects will arise from the proposed development as it emerges, the development of this land is sensitively located and is visually well contained. Furthermore, the landscape and visual effects are limited to the Appraisal Site and local level receptors only in close proximity to the Appraisal Site, as identified in this Appraisal.”

As with the adjoining BESS proposal, your officers agree with this conclusion. Set in this context, it is considered that the proposal would not significantly detract from the appearance and character of this part of the countryside given the proximity to the Walpole Substation. This is effectively an additional facility with similar enclosure (2.4m high steel palisade fencing) and peripheral landscaping comprising a belt of native heavy standard trees and shrubs to the east and south of the compound, plus wildflower meadow planting to the north and west. There is also an existing hedge to the northern side of the site which affords an element of screening. For acoustic reasons being closer to dwellings on Pigeon Street and Folgate Lane, the entire site is contained by 3.5m high timber panel acoustic fencing set behind the security fencing. This would initially create a solid barrier but would be ‘softened’ with the proposed heavy standard (2-3m) tree and shrub external landscaping adjoining the compound to the east and south. This would have an instant screening impact and would mature and become even more effective over time.

In conjunction with the approved BESS adjoining Walpole Bank, additional planting is also committed/proposed in the NW corner of the field adjoining the junction of French’s Road and Walpole Bank where the road chicanes and currently has exposed views to the south. This would ‘square off’ a small parcel of margin land which would have a minimal effect upon crop production.

In response to the Parish Council’s concerns and in conjunction with application ref: 22/02265/FM, the introduction of an indigenous hedgeline on the northern side of Folgate Lane has been negotiated to create foreground screening along this public route where open views are most obvious. This amounts to approx. 800m of new hedging. This technique has been used in connection with the synchronised condenser proposal authorised under application ref: 22/01616/FM adjacent to Rose Hall Farm to the SW of the Substation. The implementation of this detailed planting scheme can be secured via condition. This would also have significant biodiversity benefits.

The equipment and buildings (2.3m – 4.5m high) would be mostly screened by the proposed line of 3.5m high acoustic fencing. The equipment and buildings may alter slightly at the detailed design stage depending on the DNO and potentially may be painted in an appropriate colour scheme - this shall therefore be agreed by condition.

The development would be seen from public vantage points along Walpole Bank which is elevated, and the road network to the east along the more exposed Folgate Lane, but would be seen in context with the existing electricity facility, pylons and overhead cabling as a backdrop.

On balance, given the separation distances involved from lower lying public areas to the east and the proposed localised mitigating landscaping measures, the effect upon the character and appearance of this locality would not warrant grounds for refusal. The development is capable of being compatible to the provisions of the NPPF and Policies CS06, CS08, DM2 and DM20 of the Development Plan.

Loss of high-quality agricultural land

Paragraph 174 of The National Planning Policy Framework (NPPF, 2021) states that planning policies and decisions should contribute to and enhance the natural local environment by recognising the 'economic and other benefits of the best and most versatile agricultural land'.

At Annex 2 of the NPPF, 'best and most versatile agricultural land' is defined as 'land in grades 1, 2 and 3a of the Agricultural Land Classification'.

Under the Natural England Agricultural Land Classification (provisional for England), the site (and surrounding area) is classed as Grade 1 farmland. Although the proposed development is located within a field of 'best and most versatile agricultural land', there are extensive areas of Grade 1 farmland surrounding the site. Given the relatively small footprint of the proposed compound (approx. 0.9ha), removal of the site area from agricultural use will not have a significant impact on the productivity of the farm as a whole and, in terms of Policy DM20, is not considered to be a significant loss of agricultural land.

Whilst development is proposed on grade 1 arable land, its temporary loss from production (25 years to correspond with that adjoining) would be off-set by the significant sustainable benefits to the community gained from electricity storage/production. There are also significant biodiversity benefits associated with the landscaping proposal which will be discussed below. As stated above, the development is believed to be totally reversible and could return to agricultural use at the end of its lifespan. Once again this may be covered via condition.

The proposal therefore accords with Policies DM2 & DM20 of the SADMPP . With regards to the NPPF, the proposal accords with Paragraph 158, but there is conflict with Paragraph 174; however, this will be addressed in the Planning Balance/Conclusion below.

Flood risk implications

The site lies in Flood Zone 3A of the SFRA and Tidal Hazard Mapping Zone produced by the EA; the application is accompanied by a site-specific FRA. This proposed development comprises 'essential infrastructure' which, according to national flood risk guidance, is compatible to FZ3 subject to passing Sequential and Exception Testing.

In terms of Sequential Testing there are no alternative reasonably available sites in lower flood risk zones capable of taking this development. It is proposed in this location as it is co-located to the Substation and linkage to the national grid.

Whilst in Flood Zone 3A and THMZ, the application is accompanied by a site-specific Flood Risk Assessment (FRA). In terms of mitigation, it is proposed to raise the electrical equipment approx. 0.3m above existing ground level (above EA's predicted flood water level) and in case of a flood, the agent informs that the equipment would be fitted with circuit breakers to isolate the facility from the network.

At the time of writing this report the Environment Agency's comments are outstanding but on the adjoining proposed facility they raised no objection to this proposal subject to condition. It is expected that the outstanding comments will be covered in late correspondence.

Lessons learned from the BESS proposal at Saddlebow (22/01151/FM) required details of a scheme to dispose of foul and surface water and for a scheme to contain and dispose of any contaminated water resulting from firefighting in the event of a fire.

Ground conditions are not suitable for infiltration of surface water run-off into the ground. A sustainable approach to surface water management is proposed using SuDS techniques that direct run-off into a detention pond towards the west of the compound for storage and controlled discharge off-site to the local ditch system. The off-site discharge is to be limited to 1.03 l/s/ha for the site. The use of Filter Drains and detention pond may provide water quality benefits to the receiving watercourse some 120m to the south. This strategy complies with the requirements of Planning Policy and provides a sustainable approach to surface water management. The IDB are aware of this proposal and the discharge will require their consent under the provisions of the Land Drainage Act.

It is concluded that the proposed development meets the exception test as the development would provide wider sustainability benefits that would outweigh flood risk, and it has been designed to mitigate and adapt to climate change and is not expected to increase the risk of flooding elsewhere. As such, the scheme complies with Policy CS08 of the Core Strategy, PPG and Section 14 of the NPPF.

Highway issues

The application is accompanied by a Construction Traffic Management Plan (CTMP) which identifies the access route for HGVs (both inbound and outbound) to be southwards from the A47, Lynn Road (Walton Highway), West Drove (North) and Folgate Lane. This is similar to that used for the Rose and Crown solar farm.

Folgate Lane is restricted in width, but HGVs will be controlled by a logistics manager on site throughout the construction phase. Access for emergency vehicles will be always maintained.

The construction phase is expected to be 12 months. During this period, construction HGV traffic would peak at up to five deliveries per day over a four-week period. These deliveries would typically be undertaken using 10m long, eight-wheeled tipper trucks. In total there will be approximately 110 vehicle loads of stone required to create the access road and stone platform. Once the construction of the stone platform is completed, the batteries would be delivered to the site using articulated HGVs. The batteries will be constructed off-site and delivered in containers. It is expected that the delivery of the batteries would result in four deliveries per day over an eight-week period. A 200T crane would be utilised to lift the batteries into place. The haul route would be inspected and repaired accordingly in consultation with the Local Highway Authority (LHA).

The LHA has a strong preference that access to the site is gained via Walpole Bank for construction vehicles. However, provided that the HGV's are restricted to 5 per day for the initial period and are then tailed off in number, then ultimately (although far from ideal), the LHA believe that it would be difficult to substantiate an objection to the application at such a level.

There are several large energy-related schemes with permission coming forward which will use haul routes via the A17 to the north. To vary this and utilise a similar route as the Rose and Crown solar farm construction would not be unreasonable. Fundamentally whilst a preference has been indicated, there is no technical objection raised by the LHA to the southern haul route via the A47.

Therefore, if we are minded to approve the application in its present form, the LHA recommend conditions be applied covering refinement of the CTMP, plus access construction of both principal and emergency routes.

The proposal therefore accords with Policies CS08, CS11 & DM15 of the Development Plan.

Ecology and biodiversity

There are no statutory or non-statutory designated sites within a 2km radius which will be affected by the proposed works. The application is accompanied by a Preliminary Ecological Appraisal which states inter alia that:

- Based on the findings of the 2022 field survey and given the implementation of the following appropriate mitigation measures:
- Limited night-time working will be undertaken, and new lighting requirements will be designed in accordance with the BCT and ILE Artificial Lighting in the UK guidance;
- All areas of vegetation requiring removal will be checked for nesting bird activity a maximum of 48 hours prior to the commencement of works by a suitably qualified ecologist (if undertaken during the nesting season); and
- Implementation of habitat manipulation works to discourage reptiles from the proposed area of works.

It is considered unlikely that there will be significant effects on legally protected habitats or species.

The landscaping proposals for the site include the provision of a significant length of new native species-rich hedgerow, the creation of areas of meadow grassland and the creation of a surface water attenuation basin. These habitats will provide a significant overall enhancement compared to the existing arable land.

In respect of biodiversity, there would be a net gain as follows: For habitats a 19.75% net gain, and for hedgerows 7.30 units - a 100% net gain. (Exceeding the target of 10% set out in the Environment Act 2021.) Our Senior Ecologist has reviewed this assessment and raises no objection subject to securing mitigation measures via condition.

In respect of planning policy, the development complies with Policies CS12 and DM15 together with paragraph 174 of the NPPF in that it has appropriately considered biodiversity and ecological matters and will deliver a substantial net gain in biodiversity.

Impact upon neighbour amenity

The application is accompanied by a Noise and Vibration Impact Assessment produced by Royal HaskoningDHV which assesses the cumulative impact of both the approved and proposed schemes; it concludes as follows:

“The assessment, which is considered to be the worst case scenario, has shown that noise from the proposed facility, individually and in combination with other developments in the area, may give rise to noise levels above measured background (dB LA90) noise levels, particularly at Primrose Cottage (to the south) and Castoffs (to the north), however that these are still below the Lowest Observed Adverse Effect Level (LOAEL) of 40 dBL_{night,outside}. Consequently, it is considered that there is little likelihood of adverse effect for the occupants of the nearest Noise Sensitive Receptors to the proposed development, in light of the observations of the World Health Organisation Night Noise Guidelines for Europe, which state: “There is no sufficient evidence that the biological effects observed at the level below 40 dB L_{night,outside} are harmful to health”.

In light of these findings, it is concluded that the operation of the proposed facility, individually and in combination with other schemes in the area, will not give rise to significant adverse effects for the occupants of the surrounding residential properties.”

This conclusion/view is shared by our CSNN colleagues, and the mitigation measures may be secured via condition.

The application is also accompanied by a Construction Traffic Management Plan which covers such things as dust suppression, contractor parking and wheel washing facilities. Once again this may be secured via condition. Hours of construction were restricted on the other BESS proposals to be 0830 – 1700 hours Monday to Friday and 0830 – 1300 hours on Saturdays; for consistency this can be repeated.

Changes in HGV movements as a result of the development are not considered as significant for air quality purposes as set out within the CTMP. However, given the proximity of other developments around Walpole Substation our Environmental Protection colleagues have considered the cumulative impacts. Vehicle emissions from HGVs will be separate as routing will be via Folgate Lane to connect to the A47 to the south, rather than to north as in the other sites. As long as development therefore proceeds in accordance with the plans, there would be no objection in terms of air quality. An EV charging facility within the site is recommended but based on the applicant’s response that explained that only very limited parking is proposed (4 spaces) and limited vehicle trips are expected (1-2 transit vans per week), it is accepted that any use of an EV charging facility would be infrequent and very low level and therefore it is not reasonable to request such provision.

Details and implementation of the lighting scheme will be secured via condition.

As a result, the amenity of the nearest dwellings will be protected, complying with Policy DM15 and DM20 of the Local Plan in respect of noise, dust etc.

Fire safety

Concerns have been raised by the Parish Council and local residents with regards to fire precautions and refer to coverage of instances of fires at similar facilities most notably an incident in Merseyside some years ago.

The application is accompanied by a Battery Safety Management Plan, prepared by 'Field', which states inter alia:

"It is proposed that the BESS will use Lithium Ferrophosphate (LFP) battery cells as its chosen form of Lithium-Ion battery chemistry. LFP batteries are proven to have a higher initiation temperature and a lower peak heat generation during thermal runaway when compared to other types of lithium-ion batteries. This makes LFP batteries inherently safer than other chemistries, by preventing the initiation of thermal runaway and the propagation between components...

And concludes:

"Field is seeking to develop a Battery Energy Storage System with associated infrastructure including access and landscaping at Land adjacent to Walpole Bank Road. The site will have an installed total capacity of up to 100MW. The proposed Development will connect to the existing Walpole National Grid Substation. The BSMP outlines how the Development will be managed from a fire safety risk mitigation perspective. The document collates the technical and safety information used for the detailed design of the BESS to ensure that all safety concerns around the facility are addressed in so far as is reasonably practicable. The BSMP may be updated once the proposed phasing of development is known and in line with any new regulations and/or guidelines that are introduced."

This document has been reviewed by Norfolk Fire and Rescue Services and will require additional information, but this could be covered via condition. With the inclusion of the emergency access route being provided there is no objection from NFRS.

Other material considerations

Archaeology: Historic Environment Services indicate that previous archaeological investigations in the east of the application site have recorded various features, deposits and artefacts Anglo-Saxon and medieval date. Pottery of medieval date has been found within the application site.

Consequently, there is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be adversely affected by the proposed development. A programme of archaeological mitigatory work in accordance with National Planning Policy Framework (2021), Section 16: Conserving and enhancing the historic environment, para. 205 can therefore be secured via condition.

Crime and disorder: There are no significant crime and disorder issues raised by this proposed development. Whilst the facility would be un-manned during the operation phase, CCTV cameras and lighting mounted on 7no. 4m high columns are proposed to ensure security of the facility without adversely affecting light pollution (details of the lighting scheme is to be agreed via condition as stated above). It is not unusual for facilities such as this to be effectively monitored and controlled remotely.

Contamination: The information submitted indicates that there could be potential for contamination through made ground and previous pesticide and herbicide use. This is judged to be a Moderate to Low risk. Due to the recommendations in the report a suite of conditions is suggested by our Environmental Protection colleagues to cover this matter.

Environmental impact assessment: The proposal has been formally screened and does not require Environmental Impact Assessment. This has been confirmed under separate cover.

PLANNING BALANCE/CONCLUSION

Whilst the temporary (25 year) loss of grade 1 agricultural land is recognised (Paragraph 174(b) of the NPPF), in the planning balance it is clear that considerable weight should be attached to the benefits associated to the production and management of sustainable energy as we push towards the national target of Net Zero emissions before 2050. This is strongly supported in national policy guidance, as well as the Council's own planning policy. It also aligns with the Council's own Climate Change Strategy and Action Plan.

This is a relatively small area of land (0.9ha) which, even combined with the adjoining proposals, would not create a significant detrimental effect upon productivity of the farm itself or that sector taken holistically. In terms of Policy DM20, it is also not considered to be a significant loss of farmland.

It would also be seen in context with existing and proposed/approved infrastructure nearby, and, with the introduction of associated landscaping, would not significantly affect the appearance and character of its wider countryside setting. It is therefore considered to be acceptable on landscape impact grounds.

There are no technical issues that cannot be dealt with via planning conditions and no objections from statutory consultees. Adverse impact upon residential amenity can be suitably controlled through mitigation measures such as acoustic fencing plus a Construction Traffic Management Programme (CTMP). Most notably there is no objection from the Norfolk Fire & Rescue Service to the scheme on safety grounds, and a safety plan can be suitably conditioned (as used by the Planning Inspectorate).

Overall, the proposal is considered to accord with the provisions of the NPPF, NPPG, Policies CS01, CS06, CS08, CS11 & CS12 of the Core Strategy (2011) and Policies DM1, DM2, DM15, DM17 & DM20 of the SADMPP (2016). It is therefore duly recommended for approval subject to certain conditions stated below.

RECOMMENDATION:

APPROVE subject to the imposition of the following condition(s):

- 1 Condition: The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
- 1 Reason: To comply with Section 91 of the Town and Country Planning Act, 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act, 2004.
- 2 Condition: With the exception of the details required in connection with Condition 7 below, the development hereby permitted shall be carried out in accordance with the following approved plans: 002.1.2 Revision O, 001.1 Rev 1, 001.3 Rev 2, 001.4 Rev 2 003.9, 004.1, UG_1744_LAN_FBP_DRW_04 Rev. P02 and UG_1744_LAN_GA_DRW_01 Rev. P04, unless otherwise agreed in writing with the Local Planning Authority.
- 2 Reason: For the avoidance of doubt and in the interests of proper planning.
- 3 Condition: The permission hereby granted is for the proposed development to be retained for a period of not more than 25 years from the date that electricity is first taken from the grid network (the first Import Date), this date to be notified in writing to the Local

Planning Authority. By the end of the 25 year period the battery storage installation shall be decommissioned. No later than 6 months after decommissioning, all related structures, containers, equipment and infrastructure shall be removed and the site restored in accordance with a restoration scheme which has been submitted to and approved in writing by the Local planning Authority. The restoration scheme shall be submitted to the Local Planning Authority no less than 6 months prior to decommissioning. The Local Authority must be notified of the cessation of electricity importation and exportation in writing no later than 5 working days after the event.

- 3 Reason: To define the terms of this permission as the application site lies in the open countryside and it is important that once the development has ceased the site is brought back into a full agricultural use in accordance with the provisions of the NPPF and Core Strategy Policies CS06 and CS12 of the LDF.
- 4 Condition: If the development hereby permitted fails for a continuous period of 12 months to supply electricity to the grid network, then, unless otherwise agreed in writing with the Local Planning Authority, the containers and associated buildings, equipment and infrastructure shall be decommissioned and removed from the site in accordance with a scheme to be submitted to the Local Planning Authority no more than 3 months after the end of the 12 month period. The land shall be reinstated in accordance with the scheme within a period of 6 months after the end of the 12 month period.
- 4 Reason: The application site lies in the open countryside and it is important that once the development has ceased the site is brought back into a full agricultural use in accordance with the provisions of the NPPF and Core Strategy Policies CS06 and CS12 of the LDF.
- 5 Condition: The landscaping (including a new hedgerow along the northern side of Folgate Lane) shall be implemented in accordance with the details submitted and contained in the approved plans: UG_1744_LAN_FBP_DRW_04 Rev. P02 and UG_1744_LAN_GA_DRW_01 Rev. P04, unless otherwise agreed in writing with the Local Planning Authority.
- 5 Reason: To assimilate the development into its countryside setting, in the interests of visual amenity and nature conservation and accord with the provisions of the NPPF and Core Strategy Policy CS12 of the LDF.
- 6 Condition: The approved landscaping scheme shall be completed during the first planting season following the commencement of the development, or such longer period as may be agreed in writing by the Local Planning Authority. Any trees/shrubs/plants which, within a period of five years of being planted die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless otherwise agreed in writing by the Local Planning Authority.
- 6 Reason: To ensure the work is carried out within a reasonable period and thereafter properly maintained, in the interests of visual amenity and nature conservation and accord with the provisions of the NPPF and Core Strategy Policy CS12.
- 7 Condition: Notwithstanding the plans submitted, prior to installation, full details of the battery units, store rooms, control rooms, structures and equipment (including the colour scheme), shall be submitted to, and agreed in writing by, the Local Planning Authority. The units and structures shall be painted in accordance with the agreed colour prior to commencement of use and shall be maintained in that condition thereafter.

- 7 Reason: In order to assimilate the development into its rural setting in accordance with the provisions of the NPPF and Core Strategy Policy CS08.
- 8 Condition: The development shall be carried out in accordance with the mitigation measures contained in the submitted flood risk assessment (FRA) undertaken by Royal HaskoningDVH (ref: PC3506-RHD-02-XX-RP-Z-0005, dated: 02 November 2022). In particular, they include:
- The battery modules, array feeder substations and intake substation are to be raised at least 0.3m above ground level and above tidal breach depth.

The mitigation measures shall be fully implemented prior to commencement of use and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.

- 8 Reason: In order to protect the development at times of high risk of flooding and to accord with the provisions of the NPPF and Core Strategy Policy CS08.
- 9 Condition: Notwithstanding the submitted details, full details of a lighting scheme to serve the development shall be submitted to, and agreed in writing by, the Local Planning Authority prior to installation. The agreed lighting scheme shall be implemented and thereafter maintained and retained as agreed.
- 9 Reason: In the interests of minimising light pollution, impact on ecology, and to safeguard the amenities of the locality in accordance with the NPPF.
- 10 Condition: Notwithstanding the submitted details, prior to the commencement of any works a Construction Traffic Management Plan and Access Route, which shall incorporate adequate provision for addressing any abnormal wear and tear to the highway and wheel washing facilities for construction and decommissioning vehicles, shall be submitted to and approved in writing with the Local Planning Authority, together with proposals to control and manage construction traffic using the 'Construction Traffic Access Route' and to ensure no other local roads are used by construction traffic.
- 10 Reason: In the interests of maintaining highway efficiency and safety and to ensure that no other local roads are used by construction traffic, and to accord with the provisions of the NPPF and Core Strategy policy CS11 of the LDF.
- 11 Condition: For the duration of the construction period, all traffic associated with the construction of the development will comply with the Construction Traffic Management Plan and use only the 'Construction Traffic Access Route' and no other local roads unless otherwise approved in writing by the Local Planning Authority.
- 11 Reason: In the interests of maintaining highway efficiency and safety, and to accord with the provisions of the NPPF and Core Strategy policy CS11 of the LDF.
- 12 Condition: Prior to the first use of the development hereby permitted the accesses / crossings over the verge, on Folgate Lane and Walpole Bank, shall be constructed in accordance with a detailed scheme to be agreed in writing with the Local Planning Authority and in accordance with the highways industrial specification and thereafter retained at the position shown on the approved plan. Arrangement shall be made for

surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway.

- 12 Reason: To ensure construction of satisfactory accesses and to avoid carriage of extraneous material or surface water from or onto the highway, in the interests of highway safety and traffic movement and to accord with the provisions of the NPPF and Core Strategy policy CS11 of the LDF.
- 13 Condition: For the duration of the construction and decommissioning periods deliveries and removals shall only be received at or despatched from the site between the hours of 0830 and 1700 hours Monday to Friday, 0830 and 1300 hours on Saturdays and not at all on Sundays and Bank Holidays other than with the prior written approval of the Local Planning Authority.
- 13 Reason: In the interests of the amenities of the locality, and to accord with the provisions of the NPPF and Core Strategy policy CS08 of the LDF.
- 14 Condition: The development shall be undertaken in accordance with the mitigation measures recommended in the Preliminary Ecological Appraisal (Doc ref: PC3506-RHD-02-XX-RP-Z-0002) compiled by Royal HaskoningDHV dated 03.11.2022 and submitted as part of this application, unless otherwise agreed in writing with the Local Planning Authority.
- 14 Reason: In the interests of the ecology of this locality and to accord with the provisions of the NPPF and Core Strategy Policy CS12.
- 15 Condition: No demolition/development shall take place until an archaeological written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and 1) The programme and methodology of site investigation and recording, 2) The programme for post investigation assessment, 3) Provision to be made for analysis of the site investigation and recording, 4) Provision to be made for publication and dissemination of the analysis and records of the site investigation, 5) Provision to be made for archive deposition of the analysis and records of the site investigation and 6) Nomination of a competent person or persons/organization to undertake the works set out within the written scheme of investigation.
- 15 Reason: To safeguard archaeological interests in accordance with the principles of the NPPF. This needs to be a pre-commencement condition given the potential impact upon archaeological assets during groundworks/construction.
- 16 Condition: No development shall take place other than in accordance with the written scheme of investigation approved under condition 15 and any addenda to that WSI covering subsequent phases of mitigation.
- 16 Reason: To safeguard archaeological interests in accordance with the principles of the NPPF.
- 17 Condition: The development shall not put into first use until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the archaeological written scheme of investigation approved under condition 175 and the provision to be made for analysis, publication and dissemination of results and archive deposition has been secured.

- 17 Reason: To safeguard archaeological interests in accordance with the principles of the NPPF.
- 18 Condition: The development shall be undertaken in accordance with the mitigation measures recommended in the Noise and Vibration Impact Assessment (Doc ref: PC3506-RHD-02-XX-RP-Z-0007) compiled by Royal HaskoningDHV dated 03.11.2022 and submitted as part of this application, unless otherwise agreed in writing with the Local Planning Authority.
- 18 Reason: In the interests of the amenities of the locality, and to accord with the provisions of the NPPF and Core Strategy policy CS08 of the LDF plus Policy DM15 of the SADMPP.
- 19 Condition: Prior to the commencement of groundworks, an investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:
- (i) a survey of the extent, scale and nature of contamination
 - (ii) an assessment of the potential risks to:
 - human health,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - adjoining land,
 - groundwaters and surface waters,
 - ecological systems,
 - archaeological sites and ancient monuments;
 - (iii) an appraisal of remedial options and proposal of the preferred option(s).

This must be conducted in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) 2021.

- 19 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. This needs to be a pre-commencement condition given the need to ensure that contamination is fully dealt with at the outset of development.
- 20 Condition: Prior to the commencement of groundworks, if required, a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of

works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

20 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. This needs to be a pre-commencement condition given the need to ensure that contamination is fully dealt with at the outset of development.

21 Condition: The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of groundworks, other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

21 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

22 Condition: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 19, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 20, which is subject to the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 21.

22 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

23 Condition: Notwithstanding the submitted details, the development hereby permitted shall not commence until such time as a scheme to:

- dispose of foul and surface water; and
- contain and dispose of any contaminated water resulting from firefighting

has been submitted to, and agreed in writing by, the Local Planning Authority. The scheme shall be implemented as agreed.

- 23 Reason: To ensure that there is a satisfactory means of drainage in accordance with the NPPF. This needs to be a pre-commencement condition as drainage is a fundamental issue that needs to be planned for and agreed at the start of the development.
- 24 Condition: Notwithstanding the submitted details, prior to the first use of the Battery Energy Storage System (BESS) hereby approved, a Battery Safety Management Plan (BSMP) shall be submitted to, and agreed in writing by, the Local Planning Authority. The BSMP must define the type of batteries to be used and prescribe measures to facilitate safety during the construction, operation and decommissioning of the BESS. The BSMP shall be implemented as approved.
- 24 Reason: To secure the safe operation of the facility and to accord with the provisions of Policy DM15 of the SADMPP (2016).
- 25 Condition: Notwithstanding Drawing nos. PC3506-RHD-Z-Z-XX-SW-TP-0 002 & PC3506-RHD-Z-Z-XX-SW-TP-0 003, prior to the commencement of use of the development hereby approved an emergency access road connecting to Walpole Bank shall be provided in accordance with details of route alignment and construction that have been previously approved in writing by the Local Planning Authority. The emergency access route shall be retained and maintained for that purpose and removed upon final decommissioning.
- 25 Reason: To secure appropriate access to the site for emergency vehicles during the lifetime of the development and to accord with the provisions of the NPPF and Policies CS11 and DM15 of the Development Plan.