

AGENDA ITEM NO: 8/1(e)

Parish:	Wiggenhall St Germans	
Proposal:	Installation of a Battery Energy Storage System (BESS) comprising; self contained battery modules on skids; transformers; Power Conversion Systems Modules; Control Building; electrical connection compound including substation; control and storage containers; underground cables and conduits; access track; security fence; acoustic fence; temporary construction compound and associated infrastructure; bund and planting scheme	
Location:	Land NW of High Road Saddlebow PE34 3AW	
Applicant:	Lynn Power Limited	
Case No:	22/01151/FM (Full Application - Major Development)	
Case Officer:	Mr K Wilkinson	Date for Determination: 6 October 2022 Extension of Time Expiry Date: 28 April 2023

Reason for Referral to Planning Committee – at the discretion of the Assistant Director of Environment and Planning.

Neighbourhood Plan: No

Case Summary

This application is for the installation of a Battery Energy Storage System (BESS) to the south of King's Lynn Power Station, and to the west of High Road, Saddlebow. The River Great Ouse Relief Channel runs in a north-south direction, to the west of the site and the northern boundary of the site adjoins a (gas) Pressure Reducing Metering Station (PRMS) associated with Palm Paper mill, which is located approximately 800m to the north.

The overall site area totals some 2.2ha which includes a new access track from High Road, visibility splays, landscaping, surface water drainage feature, plus the diversion and undergrounding of a 33kV power line which currently bisects the site. The equipment would however only cover an area of approx. 3600m² contained in a 2m high bund area/surround.

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. It is anticipated that the proposed development would be operational for a period of forty (40) years.

The site is located outside of the development boundary for King's Lynn so is therefore in an area classed as countryside. However, it is acknowledged that the site abuts the neighbouring Power Station and Pressure Reducing Metering Station (PRMS) which are also within the countryside and that the location of both is immediately adjacent to the development boundary of King's Lynn and Saddlebow Industrial Estate in particular.

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The site is arable grade 2 agricultural land and in an area at high risk of flooding (Flood Zone 3A and Tidal Hazard Mapping Zone). It is also in the location of Public Rights of Ways FP8 and FP21B and National Cycle Route 1. There is significant apparatus associated with Cadent Gas, National Grid and Palm Paper in the vicinity of the site.

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) to the south of King's Lynn Power Station, and to the west of High Road, Saddlebow. The River Great Ouse Relief Channel runs in a north-south direction, to the west of the site and the northern boundary adjoins a (gas) Pressure Reducing Metering Station (PRMS) associated with Palm Paper mill, which is located approximately 800m to the north.

The overall site area totals some 2.2ha which includes a new access track from High Road, visibility splays, landscaping, surface water drainage feature, plus the diversion and undergrounding of a 33kV power line which currently bisects the site. The equipment would however only cover an area of approx. 3600m² contained in a landscaped 2m high bunded area/surround.

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. It is anticipated that the proposed development would be operational for a period of forty (40) years.

The site is located outside of the development boundary for King's Lynn so is therefore in an area classed as countryside. However, it is acknowledged that the site abuts the neighbouring Power Station, UK Power Networks 132kV sub-station and Pressure Reducing Metering Station (PRMS) which are also within the countryside, and that the location of both is immediately adjacent to the development boundary of King's Lynn and Saddlebow Industrial Estate in particular.

The site is arable grade 2 agricultural land and in an area at high risk of flooding (Flood Zone 3A and Tidal Hazard Mapping Zone). It is also in the location of Public Rights of Ways FP8A and FP21B and National Cycle Route 1. There is significant apparatus associated with Cadent Gas, National Grid and Palm Paper in the vicinity of the site.

The proposed development consists of:

- 28 battery skids, with 12 self-contained battery modules mounted on each (each skid, with battery modules typically being 8.7m x 3.2m x 3.4m when mounted on blocks such that the battery is 1.0m from ground level);
- 14 transformers (typically 2.1m x 2.2m x 2.2m), with one transformer located next to each pair of battery skids;
- 28 Power Conversion System (PCS) units (typically 3.0m x 2.0m x 2.2m), with one pair located either side of each transformer;
- a control building (typically 12.7m x 4.7m x 3.7m);
- a DNO Control Building (typically 5.6m x 4.7m x 3.7m) to contain switchgear equipment;
- a metering cabinet (typically 1.1m x 0.4m x 1.4m);
- a DNO storage building (typically 3.0m x 2.1m x 2.1m)
- a spares and equipment container (typically 6.0m x 2.1m x 2.1m);
- a HV substation (typically 43.2m x 21.6m) that will be operated by the Distribution Network Operator (DNO), UK Power Networks (UKPN), containing HV switchgear, isolation equipment, 132kV transformer (typically 7.0m x 4.2m x 6.1m) and perimeter fence;
- a 3.5m acoustic fence, 3.0m weldmesh fence and access gates;
- security CCTV cameras;
- access tracks;
- bunding;
- associated infrastructure including underground pipes and power and communications cables;
- a substantial planting scheme located on and around the proposed bunding; and
- an associated drainage swale.

The application is accompanied by a Planning Statement, Ecological Assessment (including a Shadow Habitats Regulations Assessment (HRA)), Noise Impact Assessment, Archaeology Assessment, Landscape & Visual Impact Assessment, Construction Transport Management Plan, Contaminated Land Report, Transport Statement, Arboricultural Assessment, Environmental Report & Design and Access Statement.

SUPPORTING CASE

The following statement is made in support of this application:

“Battery Energy Storage plays an essential role in enabling the transition away from Fossil Fuels. It is part of the solution towards achieving clean energy which is a key element in reaching the UK’s legal commitments for Net Zero emissions by 2050 and also aligns with the Council’s own Climate Change Strategy and Action Plan.

Both National Grid and the Committee on Climate Change have identified a need for 35GW of storage capacity by 2035 in order to support the transition to a low carbon energy grid to achieve Net Zero.

In line with both the NPPF and the Development Plan which support low carbon and renewable energy schemes where the impacts of the development are or can be made acceptable, the site:

- has been selected close to the point of connection to the Grid and has a secured connection offer for the substation to the north;
- is within the context of existing commercial and electricity infrastructure; and
- has suitable access.

Safety is a top priority for the industry and Cambridge Power. As a result, in line with the very latest industry best practice (including NFPA (National Fire Protection Association) 855 and UL (Underwriters Laboratories) 9540A test method), a range of measures are incorporated to prevent and mitigate the risk of fire including:

- Best technology selection to prevent the initiation of thermal runaway;
- Appropriate spacing of equipment within the site layout design;
- Integrated temperature, smoke and fire detection and suppression system with liquid cooling to regulate battery temperature;
- A water supply of the flow rate requested by Norfolk Fire has been offered by Anglian Water
- 24 hour a day monitoring and control of all aspects of the BESS.

Positive discussions have been held with Norfolk Fire and Rescue Service and as a result, they have confirmed that the measures proposed meet their expectations. Cambridge Power can reaffirm their commitment to continue working with the Fire Service to develop a suitable Emergency Response Plan to be secured by planning condition.

Planning guidance does refer to the use of lower quality agricultural land, where possible. However, there is no lower quality land available within the immediate area and the loss of agricultural land will be relatively limited and is reversible due to the 40-year life of the permission being sought. In the wider area, lower quality land around settlements is available, but this would not be suitable for locating a BESS. Also, the Council has deemed by way of a formal screening decision that the land is not EIA development, i.e., it is not significant in terms of scale or environmental impact.

Flood defences are in place in the locality. In the unlikely event of flood, Circuit Breakers will activate which will isolate the BESS. This will prevent damage to the wider infrastructure network.

Noise has been considered and addressed by the careful placement of acoustic fencing to ensure the development does not give rise to amenity issues; and

The proposal includes beneficial landscaping and will deliver a significant level of Biodiversity Net Gain: +117.9% for habitats, and for hedgerow units the gain is +97.5%.

The proposed Battery Energy Storage System, subject to conditions, accords with local and National Planning Policy and should be approved without delay.”

PLANNING HISTORY

2/95/0768/SU: No objections to Crown application: 11/07/95 - Construction of 33kv overhead line (Delegated decision)

Adjoining site to north:

15/02090/FM: Application Permitted: 21/03/16 - High pressure gas pipeline between National Grid National Transmission System and Palm Paper mill site, including above ground Pressure Reduction Meeting Station and minimum offtake connection and associated access, landscaping and means of enclosure (Delegated decision)

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RESPONSE TO CONSULTATION

Wiggenhall St Germans Parish Council: SUPPORT with conditions that a noise survey is considered at the Ouse Amateur Sailing Club, that the gas assets protection satisfy the relevant agencies and that fire breaks to protect the site from external wildfires are considered with advice from Norfolk Fire and Rescue and included in the site design as appropriate.

Local Highway Authority (NCC): NO OBJECTION subject to conditions relating to access construction, gates set back, gradient not exceeding 1:12 for first 15m into the site, visibility splays and Construction Management Plan provision.

Local Highway Authority (NCC) – Public Rights of Way Officer: NO OBJECTION on Public Rights of Way grounds as although Wiggenhall St Mary Footpath 8 is in the vicinity, it does not appear to be affected by the proposals.

Lead Local Flood Authority (NCC): NO COMMENTS

East of Ouse, Polver & Nar Internal Drainage Board: NO OBJECTION- The applicant should be reminded that any works in, over, under, or within 9m of bank top of the North Sea Drain will require the separate legal consent of the East of Ouse, Polver and Nar IDB.

Environment Agency: NO OBJECTION subject to condition relating to a scheme to dispose of foul and surface water plus contain and dispose of any contaminated water resulting from firefighting.

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.

Environmental Health & Housing – Environmental Quality: NO OBJECTION subject to condition relating to unexpected contamination during construction/development plus implementation of Construction management Plan to suppress dust.

Environmental Health & Housing – Community Safety & Neighbourhood Nuisance: NO OBJECTION subject to conditions.

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

Norwich International Airport Safeguarding: NO OBJECTION - this development will not provide a significant collision risk to aircraft operating in the vicinity of Norwich Airport or interfere with our surveillance systems.

NATS Safeguarding: NO OBJECTION

Anglian Water: NO COMMENTS - The applicant should check for any Anglian Water assets which cross or are within close proximity to the site. Any encroachment zones should be reflected in site layout.

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.

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Cadent Gas: NO OBJECTION

Health & Safety Executive: DOES NOT ADVISE AGAINST

National Gas Transmission: NO OBJECTION subject to condition to safeguard the Feeder 4 gas pipeline which crosses the site. Such details shall include an Earth Resistivity Study and any measures necessary to ensure the safe and continued operation of the gas pipeline and safe working arrangements.

UK Power Networks: NO OBJECTION

Natural England: NO OBJECTION - the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

REPRESENTATIONS

A total of **THREE** items of correspondence received, including one from the Ouse Amateur Sailing Club, **OBJECTING** on the following summarised grounds:

- Noise impact on the nearby sailing club approx. 120m to NW
- Health and safety measures – prone to electrical fires
- Security measures during construction and operation
- Temporary loss of power during connection to the grid and commissioning – request to be done during night and when business is not operating
- What will occur in the two parcels of land either side of the new access track?
- Devaluation of properties
- Noise pollution
- Dust during construction
- Road closures on High Road to create access point
- Increased traffic
- Loss of habitat
- Environmental damage flooding could cause

ONE further item of correspondence from the Ouse Amateur Sailing Club **withdrawing earlier objection** following a meeting with the agents/developers and stating that their concerns have been laid to rest.

Cllr Alexandra Kemp: I maintain my strong objection to this facility so near to South and West Lynn and the potential risks of air pollution and human health, with toxicants carried on the prevailing south-westerlies, in the event of thermal runaway or malfunctioning or combustion of the lithium-ion batteries. The effectiveness of remote monitoring of the facility from an office in Bury St Edmunds does not inspire confidence. I call this Application in to be determined by the Planning Committee and I call upon the other ward members to do so. This Council needs to take responsibility and determine this Application in public. Not to do so, would be a dereliction of duty.

Cllr Charles Joyce: This application does need to go before a Planning Committee. There will be a clear and present danger should this application be approved, and failures later happen once the project begins. Such a possibility is an exceptional circumstance that is not present in the more usual applications which generally cover development of domestic or retail property.

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Cllr Brian Long: This application is I believe well outside the time for call in by members, but because of the public interest would urge the Director to consider using his powers to facilitate it going to committee.

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)

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)

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 – Open Inland Marshes - E2 Saddlebow and Wormegay.

The landscape is a transitional area of industrial and commercial land uses, beyond the settlement edge of King's Lynn, where the open landscape to the south of the site becomes more rural and punctuated with agricultural farmsteads (including farm buildings), isolated villages and small hamlets, being largely arable farmland and forming a generally flat open field landscape with some established field margins.

The local area in the vicinity of the site is also dominated by large scale energy related infrastructure, including the King's Lynn Power Station which lies just to the north, together with the recently completed gas Pressure Reducing Metering Station (PRMS) and National Grid Transmission System Minimum Off-take Connection (MOC), and there are pylons and overhead wires that cross the surrounding landscape.

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:

“The development of the Site will represent a slight degree of change on a relatively small part of the Saddlebow and Wormegay LCA (Landscape Character Area), in a location where it has a relatively lower sensitivity to change in respect of new low-level elements, compared to the wider landscape beyond. It is recognised that the proposed structures will be of a scale and

appearance much smaller and subservient than that of the more prominent surrounding features of the King's Lynn Power Station, which forms a prominent backdrop to new development (albeit includes the associated vegetation).

The proposed scheme includes significant planting of buffers, wooded blocks, trees and hedges to reinforce the landscape structure and provides softening of the battery energy storage facility integrating it (and some of the existing infrastructure) better into the landscape.

Overall, the significance of the landscape effects with regard to the proposed scheme ... has been assessed to represent a *Slight to Moderate Adverse Effect* on the landscape resource and landscape character in Year 1 following completion. Once the landscape scheme has established, the longer-term effect is considered to be a *Slight Adverse to Negligible Effect*.

The visual effects are limited and localised, where the effects on visual amenity are anticipated to range from *Moderate Adverse to Negligible Effect overall*. Once an established scheme has developed it is anticipated to range from *Slight Adverse to Negligible Effect*.

One set of the existing pylons on Site will also be removed and the cables sunk below ground which will in turn help to improve the character of the area and appearance of the Site looking in.

It is envisaged that whilst the scheme is reversible, the Site will cease to operate at some point in the future and will then allow the land to be restored; however, it is recognised that this will occur well beyond 15 years (being the time for the effects of the established scheme to be assessed), although at this point the existing vegetation that will have established will be retained in the landscape, ensuring longevity with the key green infrastructure elements."

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. The equipment and buildings will be mostly screened by the proposed 2m high bunding in front of a secondary line of 3.5m high acoustic fencing, plus planting on the bund and hedging in the foreground on High Road. The only taller elements above the acoustic fencing would be the transformers, switch plant and surge arresters between 6.2 – 7.5m tall situated at the northern end of the site adjacent to the Pressure Reducing Metering Station (PRMS). The equipment and buildings may alter slightly at the detailed design stage and may also be painted in an appropriate colour scheme - this shall therefore be agreed by condition. The tree and hedgerow planting proposed to 'soften' the appearance of the development and assimilate it into its setting, combined with additional significant ecological benefits, may also be controlled via condition.

Beyond the compound to the south and north-east there are 33kV termination poles proposed where the existing powerlines are to be re-routed and buried to avoid the facility.

Given 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 2 farmland. Although the proposed development is located within a field of 'best and most versatile agricultural land', there are extensive areas of Grade 1 and Grade 2 farmland surrounding the site. Given the relatively small footprint of the proposed development (0.6ha including bunding), 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 2 arable land, its temporary loss from production 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 (40 years). Once again this may be covered via condition.

The proposal therefore accords with Policies DM2 & DM20 of the SADMPP.

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 Power Station and linkage to the national grid.

Whilst in Flood Zone 3A and THMZ, the site is in a defended location where the River Great Ouse flood defences provide a standard of protection of 1 in 200. Environment Agency modelling has considered the effect of a breach failure to the defences for a number of locations and produced combined breach mapping. The actual risk of a breach occurring is considered to be low as it is expected that flood defences would continue to be maintained to a good standard, as at present. The overall risk to the site from flooding from the River Great Ouse remains 'low'.

In order to mitigate against flood risk, it is proposed to raise the electrical equipment approx. 0.6m above existing ground 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.

The Environment Agency raises no objection to this proposal subject to condition of 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 due to impermeable soils and the potential for a high groundwater level. A sustainable approach to surface water management is proposed using SuDS techniques that direct run-off into a detention basin/swale to 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 2.0 l/s/ha for the site. The use of Filter Drains and a swale/detention basin will provide water quality benefits to the receiving watercourse. 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

Access to the site is proposed via a new junction off High Road approx. midway along the frontage between the corner/FP8 and New Farm House. This would be to NCC specifications and metalled for 15m into the field. Thereafter a new track (5m wide) would be constructed across the field. This would have the appearance of typical vernacular farm tracks with a crushed stone running surface which would be allowed to grass over in time.

A detailed Construction Traffic Management Plan and Access Route accompanies the application. This illustrates the arrival and departure routes via the A10 and A47.

The Local Highway Authority has confirmed that the transport assessment is appropriate, and the haul route and access arrangements are satisfactory. All highway related issues can be secured via condition listed below.

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

Ecology and biodiversity

Within 2km of the application site there is a statutory designated site: The River Nar SSSI (Site of Special Scientific Interest) situated approx. 830m to the east separated by High Road and arable fields. Plus, two non-statutory designated sites: The Saddlebow Reedbeds County Wildlife Site (ref.404; 890m north) and West Winch Common County Wildlife Site (ref.390; 1.65km east).

The application is accompanied by an Ecological Assessment, including a Shadow Habitats regulations Assessment (HRA), which concludes inter alia that:

- a) The nearest designated sites are >800m from the Site and impacts are assessed as negligible. The Site and nearby areas are not suitable as habitat for birds or animals associated with Ramsar or Nature Directives sites in The Fens and West Norfolk, and will not impact the site integrity of any such sites;
- b) Species mitigation is proposed as follows:
 - * Lighting impacts will be mitigated via the design of the proposed scheme, such that only limited security lighting will be required, and this will be controlled by activity sensors to limit the duration of lighting.
 - * Nesting birds. Hedgerow removal and removal of any other vegetation or areas with intrinsic potential for nesting birds should avoid the nesting bird season (which runs from March to August inclusive), or otherwise follow an inspection to confirm that nesting birds are not present prior to works commencing.
 - * Reptiles. Formal mitigation is not required for reptiles, as the work will not directly impact potentially suitable verge habitat.
- c) The development is located on arable cropland of low intrinsic value and of low importance to species, and the removal of the hedgerow will be mitigated by new hedgerow planting. The overall impacts of the scheme are therefore assessed as low.

The proposed landscaping scheme includes new planting of shrubs and wildflower grassland, and hedgerow planting in excess of hedgerow removal. The on-site change in habitat units is +11.04, equivalent to a net gain of +117.9%, and for hedgerow units the gain is +1.04 equivalent to a net gain of +97.5%.

Officers agree with the findings of the assessment and the HRA.

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

There are three residential properties affected by the proposal - a pair of cottages Nos. 1 & 2 High Road almost opposite the proposed new access point which are approx. 120m away from the compound and New Farm House south of the access point some 90m away. There is also a commercial tyre business which operates to the rear of New Farm House some 56m away.

A noise assessment has been undertaken by professional acoustic consultants to identify key sources of noise associated with the Battery Energy Storage System (BESS) that have potential to impact upon those adjacent residential receptors.

A 3.5m high acoustic protection fence/enclosure is included behind the bunding in the proposed development to reduce the potential level of noise at residential receptors. The assessment concludes that with this mitigation in place, 'the rated level of noise proposed by the proposed development is acceptable at the closest residential receptors based on a worst-case scenario. Additionally, during the night-time period, the level of noise falls below the internal noise criteria level for bedrooms.'

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 would cover such things as dust suppression and wheel washing facilities. Once again this may 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.

It will be noted that initially the sailing club objected to the application, but this was subsequently removed.

Fire safety

Concerns have been raised by Councillors 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.

In response to these concerns the agent states as follows:

"We note the concerns expressed by Cllr Kemp in relation to fire risks associated with our proposed battery energy storage (BESS) facility at Saddlebow, Kings Lynn and have met with Cllr Kemp to discuss these further. Whilst most of these are directed at Norfolk Fire & Rescue Service, Lynn Power/Cambridge Power Ltd would like to reaffirm our commitment to ensuring

appropriate fire prevention measures are in place to avoid such incidents occurring in the first place.

Fire safety considerations are of the utmost importance to Cambridge Power with a range of fire prevention measures being incorporated into all our facilities. The proposed BESS facility has been designed to comply with all current safety standards including adherence to NPFA 855 Standard for the Installation of Stationary Energy Storage Systems and relevant IEC (International Electrotechnical Commission) and UL standards to ensure safety. The proposed BESS facility will incorporate a wide range of safety management features including cooling systems and technologies to keep the internal operating environment cool, temperature monitoring and fault diagnostics. The installation will also be subject to high standards of monitoring and maintenance to ensure optimum performance and safety of the assets.

The proposed BESS installation comprises of battery racks, consisting of modules, which contain lithium-ion battery cells, which charge and discharge. Overcharging lithium-ion cells can, in isolated examples, risk their overheating and catching fire, known as thermal runaway, which can spread to other cells. The battery management system (BMS) controls the charge and discharge of cells in each module or pack, operating batteries in such a way as to avoid potential thermal runaway events and thus significantly reduce any fire risk. However, not all batteries are the same and that the risks of fire incidents can vary greatly depending upon the technology and battery chemistry. Lithium-ion batteries encompass several types of chemistries, some of which are far less sensitive to thermal runaway, due to their chemical composition. One of the safest in this regard is lithium iron phosphate (LiFePO₄ or LFP) technology which is now becoming the predominant chemistry being used by battery manufacturers due to historic incidents with other less stable chemistries such as Lithium Ion NMC (nickel, manganese and cobalt) batteries which have a lower threshold for thermal runaway than LFP. Indeed, the battery facility at the Liverpool facility Councillor Kemp refers to used NMC based batteries. Unlike NMC and similar chemistries, LFP batteries do not produce oxygen during a thermal runaway event (and are also much more thermal runaway resistant due to their chemistry), greatly reducing their flammability. We can confirm that the proposed BESS will incorporate LFP-based batteries.

Indeed, the batteries currently proposed to be installed within the BESS have been tested for thermal runaway in accordance with UL 9540A. The BESS system passed the test without any flaming or deflagration...

It is increasingly standard practice that a Risk Reduction and Mitigation Strategy or similar report would be provided as part of the detailed level design (including construction and electrical details for instance) and secured by way of a pre-commencement planning condition. That is the approach that has been recommended in this instance by Norfolk Fire and Rescue Service in this case. This is in our view a reasonable and proportionate measure to further mitigate risks and we can confirm the Applicant's agreement to such a condition. We would stress that we have already engaged with Norfolk Fire and Rescue Service in relation to such matters and we can confirm our commitment to continue to engage and work with NF&RS as part of the development of a suitable Risk Reduction and Mitigation Strategy to satisfy any planning condition imposed in the event of an approval."

The site has potential access from two directions (from the north and south) which would afford access to fire services in response to an emergency. It will be noted that the consultation response from the Norfolk Fire & Rescue Service has not objected to this proposed development, subject to conditions covering fire risk and mitigation strategy, emergency response plan, transport strategy, automatic detection and fire suppressant systems, water supply and fire spread containment methods.

Looking at recent Planning Inspectorate appeal decisions, a comprehensive condition has been used for a Battery Safety Management Plan to be produced prescribing measures to facilitate safety during construction, operation and decommissioning of the BESS. This would cover all the aforementioned elements and is considered to be current best practice.

National Grid have issued a licence to connect to the network so there is capacity available, and they would ensure that there are no adverse implications relating to their infrastructure.

With the aforementioned measures to be secured via condition, the proposal would accord with Policy DM15 of the SAMPP.

Other material considerations

Archaeology: Historic Environment Services indicate that the proposed development site lies in close proximity to cropmarks of possible medieval saltern mounds (the remains of medieval salt extraction) and an area of medieval and post-medieval settlement. In addition, there are cropmarks of a former sea bank immediately to the north. 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 infra-red lighting mounted on 4m high columns are proposed to ensure security of the facility without adversely affecting light pollution. It is not unusual for facilities such as this to be monitored and controlled remotely.

Contamination: The information submitted does not indicate the presence of significant land contamination. However, the presence of an infilled former drain means that it's possible that some unexpected contamination could be present. This may be covered via condition.

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

Gas transmission/pipelines: There is a considerable amount of infrastructure in the locality, and therefore consultation with Cadent Gas, National Grid and Palm Paper will be required regarding easements etc. to prevent conflict. A pre-commencement condition has however been applied with respect to Feeder 4 gas pipeline to negate a previous holding objection from National Grid.

Devaluation of property: The effect of proposed development upon property values, whether increased or decreased, is not a material planning consideration.

Disruption to electricity supply to existing properties: The connection of the facility to the National Grid would be managed by the operator and end user and should not affect the current supply/network.

PLANNING BALANCE/CONCLUSION

Whilst the temporary (40 year) loss of grade 2 agricultural land is recognised, 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 which would not create a significant detrimental effect upon productivity of the farm itself or that sector taken wholesically. 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 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 a bund and 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: Figure 1 - Proposed Site Location, Figure 4 - Proposed Site Layout, Figure 12 - Typical Access Track Detail and Figure 13 - Proposed Fence and Gate Details.
- 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 40 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 40-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 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 shall be implemented in accordance with the Landscape Mitigation Plan dated 18 May 2022 ref: 2520-LLA-ZZ-00-DR-L-0001.
- 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: 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.

- 8 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.

- 9 Condition: With the exception of the measures required under condition 8 above, the development shall be carried out in accordance with the recommendations of the submitted flood risk assessment and surface water drainage strategy produced by Rossi Long Consulting ref: 211272 [Rev 04] dated December 2022.

The mitigation measures shall be fully implemented prior to occupation/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.

- 9 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.

- 10 Condition: Prior to the first use of the development hereby approved, details of any method of lighting and extent of illumination to the access road and compound shall be submitted to, and approved in writing by, the Local Planning Authority. The lighting scheme shall be implemented as approved prior to the use of the development and thereafter maintained and retained as agreed.

- 10 Reason: In the interests of minimising light pollution, impact on ecology, and to safeguard the amenities of the locality in accordance with the NPPF.

- 11 Condition: The development shall be undertaken in accordance with the Construction Traffic Management Plan (Doc ref: 552/CTMP) compiled by Ethical Power Connections Ltd dated 25/05/2022 and submitted as part of this application, unless otherwise agreed in writing with the Local Planning Authority. These measures include the following:

- Site construction hours limited to 0800 hours – 1800 hours weekdays, 0900 hours – 1300 hours on Saturdays and not at all on Sundays and Bank Holidays;
- The first 20m of the access road from the adopted highway shall be surfaced with tarmac;
- The access shall at all times have a 5mph speed restriction in place;
- Wheel washing facilities shall be provided and used ; and
- Deliveries to and collections from the site shall be restricted to the hours of 0930 hours – 1500 hours weekdays only.

- 11 Reason: In the interests of maintaining highway efficiency and safety and to ensure that the amenities of the locality are maintained in accordance with Policy CS11 of the Core Strategy (2011) and Policy DM15 of the SADMPP (2016).

- 12 Condition: Prior to the first use of the development hereby permitted the vehicular access / crossing over the verge shall be constructed in accordance with the highways industrial access specification for the first 15m as measured back from the near channel edge of the adjacent carriageway and thereafter retained at the position shown on the approved plan. Arrangement shall be made for surface water drainage to be intercepted and disposal of separately so that it does not discharge from or onto the highway.

- 12 Reason: To ensure construction of a satisfactory access and to avoid carriage of extraneous material or surface water from or onto the highway in the interests of highway

safety and accord with Policy CS11 of the Core Strategy (2011) and Policy DM15 of the SADMPP (2016).

- 13 Condition: The gradient of the vehicular access shall not exceed 1:12 for the first 15m into the site.
- 13 Reason: In the interests of the safety of persons using the access and users of the highway and to accord with Policy CS11 of the Core Strategy (2011) and Policy DM15 of the SADMPP (2016).
- 14 Condition: Prior to the commencement of the use hereby permitted, visibility splays shall be provided in full accordance with the details indicated on the approved plans ref: C-700 Rev P03 and C-701 Rev P03. The splays shall thereafter be maintained at all times free from any obstruction exceeding 0.6 metres above the level of the adjacent highway carriageway.
- 14 Reason: In the interests of highway safety.
- 15 Condition: No development shall take place until an archaeological written scheme of investigation 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, 6) Nomination of a competent person or persons/organization to undertake the works set out within the written scheme of investigation and 7) any further project designs as addenda to the approved WSI covering subsequent phases of mitigation as required.
- 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 be occupied/used 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 15 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: 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.

- 18 Reason: To secure the safe operation of the facility and to accord with the provisions of Policy DM15 of the SADMPP (2016).
- 19 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 current best practice, and where remediation is necessary a remediation scheme must be prepared, 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.

- 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.
- 20 Condition: Prior to first operation of the development hereby permitted, the 3.5m high acoustic protection fence shall be erected as per the approved plans and shall thereafter be maintained for the life of the development.
- 20 Reason: In order to protect the amenity of this locality and nearby residences, and to accord with the provisions of the NPPF and Policy DM15 of the SADMPP (2016).
- 21 Condition: No development shall commence until details of any access or service crossings of the Feeder 4 gas pipeline, including plans and cross sections detailing existing and proposed levels and depths of underground utilities, are submitted to, and approved in writing by, the Local Planning Authority. Such details shall include an Earth Resistivity Study and any measures necessary to ensure the safe and continued operation of the gas pipeline and safe working arrangements. The scheme shall subsequently be implemented in full accordance with the approved details.
- 21 Reason: To ensure there is no adverse impact upon existing infrastructure within the site and to accord with the NPPF and Policy DM15 of the SADMPP (2016).