BRIGG POWER STATION

External Battery Scheme

Planning Design and Access Statement

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EXECUTIVE SUMMARY

Overall, it is considered that the need for the proposed BESS, which will help the UK to more sustainably meet its energy needs, is undeniable. This type of development is encouraged at International, UK Government and local government levels. The proposed BESS will help to ensure that the UK's energy security is significantly improved, and it will address the threat of climate change by helping to reduce our reliance on fossil fuels and enable a more balanced Grid and a more cost-efficient energy system, which would ultimately reduce consumer energy bills in line with the Governments legally binding target of achieving Net Zero by 2050.

The proposal site is previously developed (brownfield) land and has a planning history of utility scale energy generation being located directly adjoining the northern elevation of the Brigg power station turbine hall. The site also lies within the settlement boundary of one of the largest towns in the area, Brigg, where there is a presumption in favour of sustainable development.

The site is well screened from the south by the power station buildings, while from the north the proposed units will be viewed against the backdrop of these same buildings. The relatively small dimensions of the energy storage units (when compared to the power station buildings) will ensure that they are not visually obtrusive, and the character and appearance of the local area will not be harmed by the development.

Identified issues of noise, flood risk, drainage, ecology and ground conditions have been addressed and the LPA can control each of them by condition, if it is considered to be necessary.

Overall, having considered and taken on board all of the pre-application advice received from the council, it is considered that the proposal now complies with all relevant development plan policies and material considerations, such that planning permission should be granted as expeditiously as possible given the urgent national need for battery storage and its benefits.

1 INTRODUCTION

1.1 This Planning Statement accompanies a full planning application, which is submitted by RPS Consulting to the Unitary Authority of North Lincolnshire Council (NLC), on behalf of Centrica Energy Assets (Centrica), who are the owners and operators of Brigg Power Station, located near Scawby Brook.

1.2 The power station was originally granted planning permission in 1989, by Glanford Borough Council (LPA reference 7/981/89), which was brought into NLC in 1996. That planning permission permitted the construction of a new power station to generate up to 250MW of energy. There have been no changes to the external appearance of the main turbine hall building since it was constructed.

1.3 In 2015 a lawful development certificate (LDC) (PA/2014/0843) was granted allowing the conversion of the power station from combined cycle gas turbine operation (CCGT) to open cycle gas turbine operation (OCGT). Since the original grant of planning permission in 1989 Centrica reduced their output to up to 99 MWe in response to market and system demands, but the original planning permission is unchanged.

1.4 Centrica is reviewing the Brigg site and considering various options to make better use of the existing asset. A recent plan considered for the site, for which a Certificate of Lawful Proposed Use was issued on 13/1/2020 (PA/2019/2007), involved the reconfiguration of the existing gas turbines inside the power station, and their replacement in part with new gas reciprocating engines, designed to provide a very fast start up capability. That scheme was not implemented, and Centrica's business model has now moved on.

1.5 Centrica considered removing the existing gas turbines and using the concrete plinths to accommodate new battery storage modules, capable of storing and generating electricity (electrical capacity of approximately 100 MWe). NLC granted a Certificate of Lawful Use or Development (CLUD) for this proposal in September 2021 (PA/2021/1288).

1.6 The current proposal would see Centrica install a new Battery Energy Storage System (BESS), initially capable of storing and generating electricity up to 50MWe, externally on land immediately to the north of the turbine hall, but still within the confines of the existing power station. The functional characteristics associated with this type of asset support the integration of increasing capacity of renewable energy, which does not always match peak production with peak demand, into the distribution and transmission electricity networks.

1.7 RPS submitted a pre-application enquiry to NLC in March 2022. NAC (Jess Hill) provided written advice in May 2022.

1.8 In addition to this statement, this planning application is accompanied by the following:

- Completed planning application form
- Constraints Plan 12428-0005-01
- Site Layout Plan 12428-0012-03
- Location plan 12428-0013-01
- RSU Enclosure Plans and Elevations 12428-0014-01
- RUI Enclosure Plans and Elevations 12428-0015-01
- Planning application fee of £2,060.20 is to be confirmed and paid by Centrica.

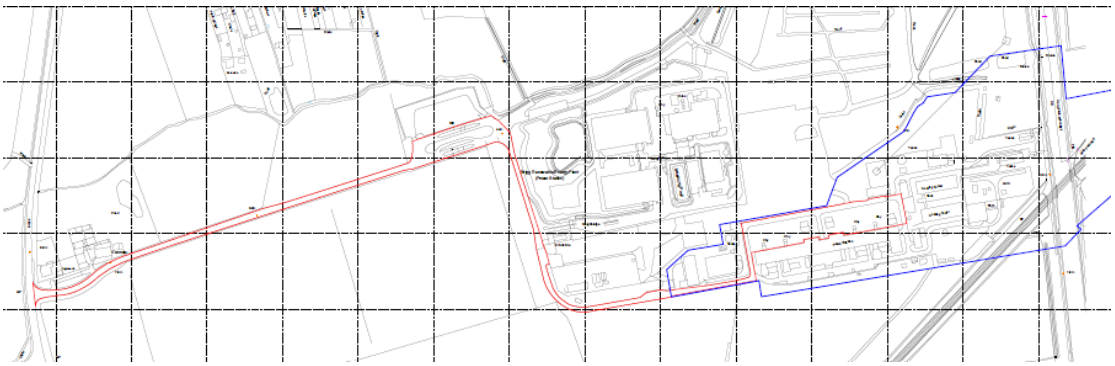
1.9 In addition to the above listed plans, this planning application is accompanied by the following reports:

- This Planning, Design and Access Statement
- Preliminary Ecological Assessment, GCN and raptor survey results
- Outline Drainage Statement and Flood Risk Assessment
- Construction Traffic Management Plan

- Stage 1 Ground Investigation Report
- Noise Impact Assessment

2. THE SITE AND ITS SURROUNDINGS

2.1 The application site is a relatively flat piece of land, which is approximately 2.088 hectares in area, including the access road. Brigg Power Station Turbine Hall is located immediately to the south of the site.



Location plan extract.

2.2 The Brigg Renewable Energy Plant lies to the north-west of the site.

Aerial view of power station and surrounding area (Google Maps).

2.2 The turbine hall and other buildings associated with the power station are substantial and highly visible in the local landscape.

View of the power station from the south-west.

2.3 The land in question is currently vacant hardstanding, where structures associated with the power station have been removed. Tall chimneys attached to the turbine hall building are situated to the south of the application site.

2.4 The application site lies within the defined development limits of the town of Brigg and it lies to the south of an employment site.

2.5 Open agricultural land (grades 2 and 3) lies to the north and south of the power station. The river Ancholme lies to the east, with the settlement of Brigg beyond.

2.5 The constraints plan, which is submitted with this planning application, indicates that the site lies within Flood Zones 2 and 3(a) Fluvial, where there is a relatively high risk of flooding. Immediately to the north of the site is an area of historic landfill.

Constraints plan.

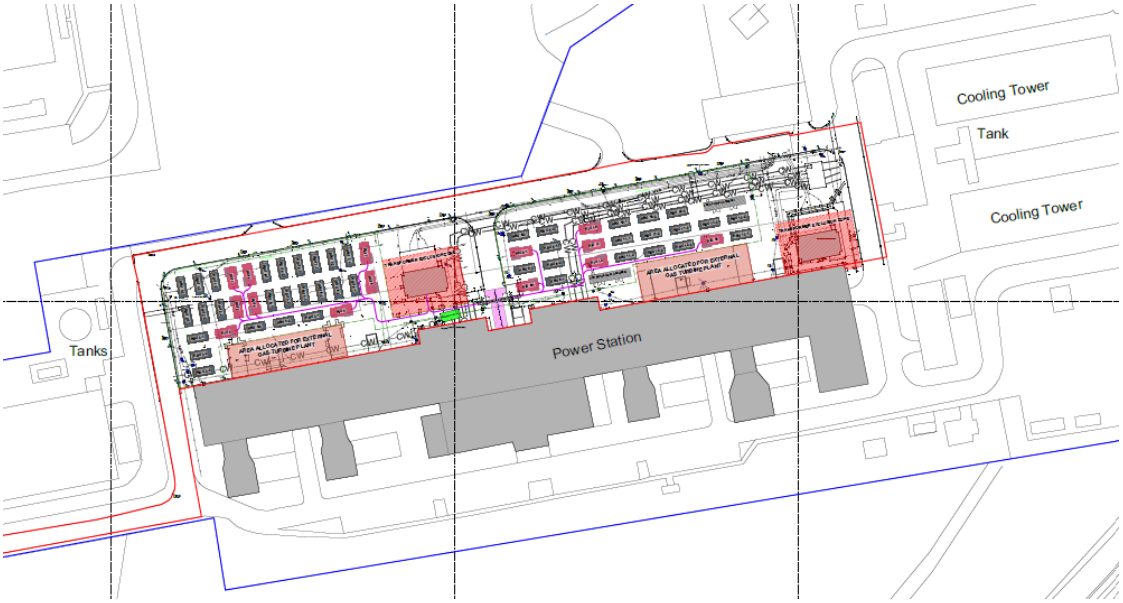
2.6 The application site does not lie in a conservation area, and it does not contain or adjoin any listed buildings. Brigg town centre conservation area contains a large number of listed buildings, which are located within 2 kilometres of the proposal site. Most of the open land between the site and the rest of the town of Brigg is in the flood zones either side of the river Anchombe.

2.7 The village of Scawby lies about 2 kilometres to the west of the site, it too contains a number of listed buildings within a conservation area. There are further small numbers of listed buildings in Castlethorpe and Scawby Brook to the north of the site and at Newstead Priory to the south. There are no public rights of way within or next to the site. There are no TPOs on the site.

2.8 Brigg Train Station is located about 2.5 kilometres to the east of the site, which provides access to the entire railway network of the UK. Vehicular access to the site is via the B2106, which runs close to the site to the north and west. The M180 can be accessed via the A78, which offers access to Scunthorpe to the north-west, Grimsby the east, Lincoln to the south and the rest of the motorway network.

3. THE PROPOSED DEVELOPMENT

3.1 The proposed BESS project, is shown on the indicative proposed layout plan below,



Proposed Site Layout Plan

3.2 The scheme is likely to comprise of:

- up to 84 Reservoir Storage Units (RSUs) and 28 Reservoir Inverter Units (RIUs) (each approximately 3m high, 6m long and 2.4m wide) with a total indicative storage capacity of up to 50MWe with an up to a 2-hour duration;
- auxiliary transformers;
- 3m wide access tracks between the units;
- 2m high security fencing around the site;
- development platforms formed by concrete plinths;
- a temporary construction compound with contractors car parking (although this is likely to fall outside the application redline shown and undertaken in accordance with the requirements of the Town and Country Planning (General Permitted Development) Order);

3.3 The site will be connected to the BESS via an underground cable which would be constructed in accordance with the Town and Country Planning (General Permitted Development) Order.

4. DESIGN AND ACCESS

Design

4.1 The Proposed Development has been designed to reduce, as far as possible, any negative impacts on the environment; not only through the function of the facility once operational but also through the design of the structures to be constructed.

4.2 Appropriate assessments and relevant surveys have been incorporated into the planning and design of the proposals to ensure the conservation and enhancement of the natural environment have been robustly considered.

Design Principles and Constraints

4.3 Various constraining factors have required consideration: including natural environment constraints such as ecology and flood risk; physical site constraints such as existing industrial structures and residential receptors, proximity to the existing Brigg Power Station, and the proximity of the local road network; and other potentially limiting factors, such as already consented planning applications in the local area.

4.4 The Proposed Development has been designed to create a high-quality built environment, considering key design principles such as linking the Site with its surroundings, sustainable design, appropriate siting, and security. It will use appropriate building materials that reflect those found in the local landscape, allowing the integration of the proposals within the surrounding environment.

4.5 The design and layout of the facility is primarily derived from its function. The scale of the facility largely depends on the output of the units and its siting has been selected due to the proximity to the existing Brigg Power Station and associated electricity infrastructure, minimising the need for excessive cable runs and reducing the amount of land likely to be disturbed by the associated works. The industrial context of the immediate area has also been a factor taken into consideration.

Design Policy and Guidance

4.6 The siting, layout and design of the Proposed Development has had regard to the following policy and guidance:

- Development Plan:
- North Lincolnshire Local Plan 2003 (saved policies)
- North Lincolnshire Core Strategy (adopted 2011)

- Material Considerations:
- NPPF
- Emerging North Lincolnshire Local Plan
- Housing and Employment Land allocations DPD (adopted 2016)
- Supplementary Planning Documents

More details regarding policy and guidance are contained in Section 7 below.

Assessment

4.7 There are several clear benefits deemed to arise from the Proposed Development and these can be summarised as follows:

• The facility is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply in support of UK Government targets and national planning policy;

- The facility is located adjoining the existing Brigg Power Station, avoiding the need for lengthy transmission cables, ensuring an efficient and straightforward connection to the grid when required;

- The site is not particularly sensitive regarding environmental considerations such as: cultural heritage, noise, air, hydrology, flood risk and ecology; and

- The site is located within an existing industrial context, including very large existing Brigg Power Station turbine hall, with limited impact on potentially sensitive receptors.

4.8 The design and appearance of the facility has been given detailed consideration and is appropriate and in-keeping with its immediate surroundings, as well as existing infrastructure typical of the adjacent commercial development.

4.9 Economic, technical, and environmental factors have all been considered in the iterative design process for the Proposed Development, primarily in relation to its siting and the size of the overall Site rather than on the appearance of the Proposed Development, where there is limited opportunity to alter the infrastructure requirements necessary to deliver the facility. Similarly, the technology available at the time of implementation will ultimately determine the appearance of the facility.

Access

4.10 Vehicular access to the Site will be from the B1206 Scawby Road. An existing internal access road leading from this junction will serve the facility and provide appropriate ingress/egress and manoeuvring for all associated vehicles. Appropriate parking facilities for visiting maintenance vehicles are provided within the proposed layout. All proposals in this regard meet the required standards and are therefore conducive to maintaining highway safety.

4.11 Provision has been made for both pedestrian and vehicular access as required. However, the site will not be accessed by the public and will only be accessed by persons needing to enter the site for operational and maintenance purposes. In terms of security, the Site will continue to be contained using fencing and CCTV to ensure that access to the public is restricted.

4.12 Whilst there are bus routes close by, and there is limited accessibility by walking and cycling, it is impractical to rely solely on sustainable means of transport given the nature of the facility. The proposed parking provision facilitates disabled access, if needed, and the site is also generally level to enable easy access for people with mobility issues. The nature of the facility requires adequate provision for suitable access by emergency vehicles and the proposed layout adequately accommodates such.

4.13 In considering appropriate design and access matters, this section of the report has demonstrated how the Site and its surroundings have been fully appraised to ensure that the final design solution achieves a balance across a range of factors, which are required to be addressed. It describes the starting point for the design of the Proposed Development and the various factors that have driven the design process.

4.14 The intention of this Planning, Design & Access Statement is to assist the LPA with the consideration of design and access issues relative to the Proposed Development and to understand the rationale behind the details of the proposed BESS.

5. SITE SELECTION AND NEED

Need for the Proposed Development

5.1 The UK generates electricity in several ways including coal, gas, nuclear, and renewable resources. The electricity system is balanced in real-time, and so matching demand (led by consumer behaviour) with supply can be particularly challenging, especially when the generation is intermittent, such as the case with renewables.

5.2 The UK Government is committed to a rapid transition towards a zero-carbon Economy. A significant expansion in low carbon electricity generation is a key part of the government's energy strategy. This is including a significant increase the expansion of onshore and offshore wind and solar which provide intermittent supply the generation of which does not always coincide with consumer demand owing to both the inherent nature of such generation and the temporal nature of consumer demand.

5.3 Consequences of this expansion include:
- Changes to the daily electricity demand and supply patterns;
- An increasingly volatile generation mix; and
- Greater issues with geographical concentration of generation – in particular, increasing flows of electricity will be seen from Scotland, the north of England and the North Sea to the south-east of England.

5.4 Transmission network constraints occur when network infrastructure limits the ability of the network to transmit all the available power to where it is needed. This is uneconomic and therefore both consumer costs and the carbon intensity of electricity increase. Constraints can take different forms, including thermal, voltage and stability.

5.5 Thermal constraints show a clear regional pattern, typically with subsidised Scottish wind being paid to turn down when its generation cannot all be exported to southern England; north-south transfer limitations represent most thermal constraints in Great Britain.

5.6 The pace of transformation to renewable energy to address the climate chance challenge is occurring faster than the ability of the network to handle such peaks in supply. Costs of transmission network constraints have been increasing significantly in recent years and National Grid ESO (who move high-voltage electricity around the country) have increased their expectations of future power flows across key network boundaries in their latest Electricity Ten Year Statement (National Grid ESO, 2021).

5.7 New network infrastructure and Pathfinder projects will go some way to limiting the increase in constrained volumes, but constraints will be a feature of the future energy system (it is not cost effective to design a transmission system that caters for all possible power flows), and the market is currently failing to deliver solutions that will provide alternatives to curtailing renewable energy when constraints do bite.

5.8 This is one of the most pressing issues for the electricity system over the next five years, as it is already a problem and is set to worsen significantly over the next five years. Action must therefore be taken immediately – this cannot be solved by a complete overhaul of the market structure that will take years to decide on and years more to implement.

5.9 Electricity Market Reform (EMR) is a UK government policy designed to:
- Incentivise investment in secure, low-carbon electricity;
- Improve the security of the UK's electricity supply; and
- Improve affordability for consumers.

5.10 The UK's electricity grid has historically relied on large, centralised power plants largely reliant on the combustion of fossil fuels. However, old coal power plants are in the process of reducing capacity and closing, as they no longer meet the required environmental and performance standards and existing nuclear power plants are reaching the end of their design lives, while the delivery of new nuclear plants has been beset by delays. In parallel, there is

the requirement to deliver a greater amount of energy due to increases in industrial, commercial and domestic demand which is increasingly required from renewable sources, but these technologies (e.g., wind and solar generation) are intermittent, only generating power when weather conditions allow. These different factors mean that demand and supply are more challenging to match.

5.11 Large-scale energy storage can help to reduce the cost of constraints and the amount of renewable energy curtailed by charging up using excess wind energy when constraints do occur, but intervention is necessary to incentivise investment in appropriate assets.

5.12 Exclusively incentivising co-location of storage with renewable developments, as part of future subsidy schemes, is generally considered to be unhelpful, because many of the renewable projects that will contribute to constraints are operational or have already been awarded contracts. Consequently, such a system does not allow for storage assets to be built in the most cost-effective locations.

5.13 The Proposed Development is therefore crucial to help maximise the efficiency of existing and future renewable electricity generation and to meet the Government's objective of maintaining a reliable and consistent electricity supply. Once operational, the new flexible and reliable energy storage facility will have the ability to respond rapidly to the short-term variations related to local demand and fluctuations in the output from renewable energy sources. The almost instantaneous response provided by the Proposed Development means that it can operate at full power within less than a second, when it is needed.

5.14 The Site is located within an area of North Lincolnshire that imports large amounts of electricity during periods of peak demand. The applicant (Centrica) has identified that there is capacity within the local distribution network to receive the energy stored by this facility, via the nearby Brigg Power Station connection to the national grid, to be used when it is required.

5.15 The efficiency of the proposed facility is significantly increased, because it will be used to supply power to the local distribution network, i.e., to be used in the area where the peak demand is required. This proposed technology will help provide energy stability and security directly where it is needed most. Furthermore, the proposals will help to optimise energy resources, which will enable the UK Government to achieve its Carbon Net Zero by its target date of 2050.

Site Selection

5.16 Sites are considered for energy storage systems where:
1) there are transmission constraints in the transmission system today;
2) they are located relatively close access to the high voltage transmission system; and
3) they are located in areas where the impact can be sensibly mitigated.

5.17 With respect to constraints, National Grid Electricity System Operator has for a long time communicated to the interested parties the nature of transmission constraints via the concept of boundaries. These are fictional lines across the country, which are assigned MW transfer capacities corresponding to their thermal capability. The advantage of this conception is that the possible power flows on specific lines can be aggregated into total power flows from one zone to another.

5.18 Urban areas must be excluded due to the lack of high-capacity transmission networks and land availability.

5.19 The location of the Site has therefore been chosen based on the availability of land, access to the transmission networks in the next 5 years, ability to implement mitigation strategies for any construction and locationally this part of the grid network will mitigate transmission constraints reducing costs to power customers.

5.20 The proximity to the point of connection is also vital, because the shorter the route, the more efficient the facility is in terms of minimising transmission losses. Longer connection routes

are also more costly and make sites with longer connection routes more expensive / less viable, ultimately resulting in increased costs to the consumer. Energy storage infrastructure essentially therefore needs to be located close to both the supply and demand for efficient operation.

5.21 As a result of this process, the proposal Site (on the basis of the wide design parameters considered) was identified as a preferred site for the following reasons:

- It is near the point of connection;
- It is in an area where there is available local grid capacity, and a significant need for largescale energy storage to relieve grid constraints;
- It is in an area which would limit any potential conflict with any existing or proposed adjacent land uses;
- It is well located in close proximity to electricity grid infrastructure;
- It is located outside of any environmental designations and in an area with relatively low landscape and ecological value;
- It is in an area of low flood risk and largely free of any other environmental constraints, helping ensure no significant environmental effects;
- It is located close to the motorway network, with good transport links;
- It is located away from main settlements; and
- The land is available and deliverable (it is owned by the applicant).

5.22 The site selection exercise looked at land within proximity to an established electricity substation and sought to provide a suitable separation from sensitive land uses, whilst avoiding the sterilisation of sites identified for future employment or other development. Ultimately, the identified site offers the most appropriate, suitable, and available site for a proposed energy storage facility in this location.

5.23 The Proposed Development, whilst in this case is proposed to be permanent, incorporates a construction style and configuration which is inherently temporary in nature due to its modular container-style arrangement. Similar to both wind and solar farms, the facility can be removed from the land should the facility no longer be required, with the concrete slabs broken up and removed, and the land reinstated to its original state. The LPA can control this by means of a suitable condition on the planning consent notice.

6. LEGISLATIVE CONTEXT

Electricity Act 1989

6.1 The Proposed Development comprises an energy storage facility, which is anticipated to store and release when needed, up to 50MW of electricity. Section 36 of the Electricity Act 1989 states that, with developments where less than 50MW of electricity is generated, the consent of the Secretary of State is not required. Therefore, due to the limited capacity of the proposal, of less than 50MW of electricity storage, it falls to be determined under the Town and Country Planning Act (TCPA) 1990, by means of a planning application to be submitted to North Lincolnshire Council.

International, UK-Wide and National Energy, Climate Change, Energy and Planning Legislation.

6.2 The justification for the Proposed Development is set within the context of legislation, policy and guidance and renewable energy targets set at International, UK and Scottish Government levels. These are material considerations in the determination of the application. During a recognised global Climate Emergency, there has been a focussed effort both to curb the emissions of greenhouse gases and to secure renewable energy sources for the generation, and secure supply of, electricity to reduce the dependence on carbon dioxide emitting, fossil fuels.

6.3 Energy storage in batteries is universally recognised as an established and important resource, which can help achieve the climate and energy targets set at International and UK levels. The ambitious Net Zero targets, which have been set, require the approval and implementation of suitable renewable energy developments at pace.

6.4 The most relevant renewable energy and climate change legislation at an international, UK and national levels to the Proposed Development are summarised below. The relevant planning policy and guidance relevant to this application are set out in Section 7 of this statement.

Kyoto Protocol 1997

6.5 The Kyoto Protocol operationalizes the United Nations Framework Convention on Climate Change by committing industrialized countries and economies in transition to limit and reduce greenhouse gases (GHG) emissions in accordance with agreed individual targets. The Convention asks those countries to adopt policies and measures on mitigation and to report periodically.

The United Nations Adoption of the Paris Agreement COP21 (December 2015)

6.6 197 countries, including the UK, adopted the Paris Agreement at the 21st Conference of the Parties (COP21) in Paris in 2015. This is an agreement, which seeks to reduce global greenhouse gas emissions and to limit the global temperature increase in this century to 2 degrees Celsius, while pursuing the means to limit this to 1.5 degrees Celsius. This was ratified by the UK Government in November 2016 and now forms part of UK Government Policy.

Committee on Climate Change Net Zero Report May 2019

6.7 In May 2019, the Committee on Climate Change (CCC) published Net Zero – The UK's Contribution to Stopping Global Warming. This report responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. The report recommends a new emissions target for the UK: net zero by 2050. The Report highlights the falling cost of key renewable technologies, which are now generally comparable or lower in cost than power from fossil fuels, whilst bringing significant co-benefits such as reduced air pollution.

The UK Climate Change Act 2008 (and amendment 2019)

6.8 In November 2008, the Climate Change Act became law requiring the UK to reduce Carbon Dioxide (CO_2) emissions and was updated in 2019 to provide a legal basis for the target of

securing a 100% reduction of greenhouse gas emissions to be achieved by 2050 (compared to 1990 levels).

Progress in Reducing Emissions – 2021 Committee on Climate Change Progress Report to Parliament

6.9 The 2021 Committee on Climate Change (CCC) Progress Report to Parliament was published in June 2021 and provides a review of Government efforts over the previous 12 months with regards to Climate Change. While UK emissions fell by 13% in 2020, much of this decline was likely a result of the Covid- 19 pandemic and as such, lasting changes are far from certain. The CCC report recommends taking action to transition to a fully decarbonised electricity system. Furthermore, it sets a target to phase out gas-fired electricity generation in the UK by 2035, subject to ensuring security of supply.

6.10 There has been significant progress in the transition to renewables, with emissions from electricity having decreased by 65% from 2009 to 2019. However, the CCC report notes that generation shares from renewable resources will need to increase to support the transition to electric vehicles. The International Energy Agency has identified solar power as producing some of the cheapest electricity in history and forecasts that if there is a rapid built-out of renewables (particularly solar and wind), net zero emissions for the power sector can be achieved by 2035 in advanced economies.

The Sixth Carbon Budget: The UK's path to Net Zero

6.11 On 9 December 2020, the CCC released The Sixth Carbon Budget which updates intermediary targets for the UK's progress to net zero.
"Our recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, it brings forward the UK's previous 80% target by nearly 15 years. There is no clearer indication of the increased ambition implied by the Net Zero target than this."

6.12 In establishing intermediary targets towards net zero, the context exists for Local Authorities to recognise the action that must be taken sooner rather than later. As concluded in the Sixth Carbon Budget:
"The implication of this path is clear: the utmost focus is required from government over the next ten years. If policy is not scaled up across every sector; if business is not encouraged to invest; if the people of the UK are not engaged in this challenge – the UK will not deliver Net Zero by 2050."

National Audit Office – Achieving Net Zero

6.13 Published on 2 December 2020, the National Audit Office report to the UK Government examines the main risks to achieving net zero effectively and efficiently. The report is forthright that most of the UK reductions in emissions have come about from the switch away from coal in electricity generation. Whilst reducing emissions further will require wider changes to the UK economy, further significant investment in renewable electricity generation will be required.

6.14 BEIS (The Department for Business, Energy and Industrial Strategy) projects that the UK will not meet its targets for emissions reduction unless action is taken to reduce the shortfall in achieving the targets set in the fourth and fifth carbon budgets. At paragraph 6 of the summary the report states that:
"Achieving net zero is a colossal challenge and significantly more challenging than the Government's previous target to reduce emissions by 80% by 2050."

6.15 At paragraph 13 of the Summary, the report confirms that BEIS will launch a Net Zero strategy prior to COP26 in November 2021. The strategy will set out the government's vision for transitioning to a net zero economy by 2050, encompassing all sectors that need to decarbonise, and closing the gap that currently exists in meeting the targets in the fourth and fifth carbon budgets. The strategy will set the level for the sixth carbon budget, review the cost of net zero and how it should be paid for, and establishing meeting net zero as part of the wider economic response to Covid-19.

The HM Government Energy White Paper - Powering our Net Zero Future (December 2020)

6.16 Following the Prime Minister's 10-point plan for a green revolution and National Infrastructure Strategy (November 2020), the White Paper marks a significant milestone in the UK's Net Zero transition, setting a Net Zero target by 2050 and outlining how this may be achieved. It relates to the generation, supply and use of energy with the drive towards Net Zero by 2050 at its core, along with energy efficient buildings and lower household bills. It signals a decisive move away from fossil fuel generation and highlights how planned Government investment has the potential to leverage billions of pounds more in private sector funding and support for over 250,000 jobs in the green economy by 2030.

British Energy Security Statement (April 2022)

6.17 This report was the Governments response to the war in Ukraine and its impact on world energy markets and supplies. It sets out the Government's strategy for responding to the current energy crisis, introducing new energy supply measures to help with the transition to the UK's Net Zero target. Amongst other measures, it emphasises increased domestic renewable energy regeneration and supporting infrastructure, including energy storage systems to increase flexibility and minimise waste, which will help to facilitate greater energy resilience and security in uncertain times.

7. PLANNING POLICY CONTEXT

7.1 BESS projects are an integral part of the UK Government's energy and climate change policy, because they are necessary to support the urgent national need to increase the generation of renewable energy. Given the intermittent nature of renewable energy generation, primarily from wind and solar, it is necessary to store it at times of excess supply so that it is available to feed into the grid at times of peak demand, otherwise it will simply be foregone, leading to the wider environmental consequences associated with the generation of energy from fossil fuels, in terms of climate change and pollution including air quality.

7.2 The Government's Overarching National Policy Statement for Energy (EN-1) was adopted in July 2011. This document clearly states, on several occasions, that there is an **urgent need** for new nationally significant electricity infrastructure projects, including renewable energy projects. These are needed to meet the UK's future energy needs and ensure that the Governments Carbon Net Zero targets are met.

7.3 Furthermore, not only is there an urgent national need for renewable energy the case for which is settled as a matter of the Government's energy policy and national planning policy, if the generation of renewable energy from existing development is curtailed by a lack of battery storage facilities the urgent national need will be even greater, as will the consequences of not meeting the urgent need even greater in terms of security of supply, cost efficiency, reliability, climate change and other environmental impacts associated with the combustion of fossil fuels. Russia's invasion of Ukraine has further highlighted the urgent need for the UK to become self-sufficient for energy. Renewable energy, with attached battery storage systems, is an important part of this requirement. There is a pressing need for BESS schemes like the one proposed, as part of a national response to the issues of climate change and energy security.

Development Plan

7.4 Section 38 of the Planning and Compulsory Purchase Act 2004 and section 70 of the Town and Country Act 1990 requires that planning applications must be determined in accordance with the relevant development plan, unless material considerations indicate otherwise. In this case, the relevant development plan is as follows:

- The North Lincolnshire Local Plan (NLLP) was adopted in 2003. This plan has been replaced by the Local Development Framework. Two of the saved NLLP policies are considered to be of particular relevance to this proposal. Some of its policies have been replaced following the adoption of the Core Strategy and Housing and Employment Land Allocations DPD. Key policies are examined below.

7.5 **Local Plan 2003 (Saved Policies)**

7.5.1 Policy DS1 General Requirements. *A high standard of design is expected in all developments in both built-up areas and the countryside and proposals for poorly designed development will be refused.*

7.5.2 Policy DS21 Renewable Energy. *Proposals for the generation of energy from renewable resources will be permitted provided that:*

i) any detrimental effect on features and interests of acknowledged importance, including local character and amenity, is outweighed by environmental benefits; and

ii) proposals include details of associated developments including access roads and other ancillary buildings and their likely impact upon the environment.

Where appropriate, conditions will be imposed requiring the restoration of the site to its original condition or the implementation of an agreed scheme of after-use and restoration.

7.6 **Core Strategy (adopted 2011)**

7.6.1 Policy CS1 Spatial Strategy for North Lincolnshire. This policy supports the market towns, including Brigg, as thriving places to live, work and visit, as important service centres serving the needs of local communities across North Lincolnshire.

- Small and medium scale employment opportunities will be encouraged to meet the need to provide local jobs. The retention of existing local employment sites will be supported and where appropriate additional land will be allocated. Around 10 hectares of employment land will be provided in the market towns, with the majority being focussed in Barton upon Humber and Brigg.

7.6.2 Policy CS2 Delivering More Sustainable Development. This policy supports the delivery of the spatial strategy set out in policy CS1. A sequential approach will be adopted. Any development outside of the defined settlements will be restricted.

7.6.3 Policy CS3 Development Limits. This policy seeks to direct development to within existing settlement boundaries. Development outside these defined boundaries will be restricted to that which is essential to the functioning of the countryside.

7.6.4 Chapter 11 Environment and Resources.

- Paragraph 11.20 encourages a reduction in the consumption of non-renewable resources where possible. Plan to reduce carbon emissions by using the best available clean technologies. Promote renewable energy sources.
- Paragraph 11.21 contains an overall aim of reducing North Lincolnshire's carbon footprint, which can be achieved in part by the promotion of renewable energy generation and low carbon energy.
- Paragraph 11.22 states that existing power stations (such as Brigg) will continue to play an important role in energy production and will continue to be a major contributor to North Lincolnshire's power generation supply to the national grid.

7.6.5 Policy CS17 Biodiversity. This policy promotes the effective stewardship of the areas wildlife. Development proposals should: safeguard protected habitats and species; ensure development retains, protects and enhances features of biological and geological interest; ensure development seeks to produce a net gain in biodiversity and any unavoidable impacts are mitigated against.

7.6.6 Policy CS18 Sustainable Resource Use and Climate Change. This policy promotes development that utilises natural resources as efficiently and sustainably as possible, including:

11. Supporting renewable sources of energy in appropriate locations, where possible.

12. Supporting new technology and development for carbon capture and the best available clean and efficient energy technology … to help reduce CO2 emissions.

The proposal comprises cutting edge energy storage technology, which will help to maximise the use of renewable energy streams in the UK economy. This will help to reduce CO2 emissions and contribute towards a Net Zero future.

7.6.7 Policy CS19 Flood Risk. Development in areas of high flood risk will only be permitted where it meets the following prerequisites:

1. It can be demonstrated that the development provides wider sustainability benefits to the community and the area that outweigh flood risk.

2. The development should be on previously used land. If not, there must be no reasonable alternative developable sites on previously developed land.

3. A flood risk assessment has demonstrated that the development will be safe, without increasing flood risk elsewhere by integrating water management methods into development.

Development proposals in flood risk areas which come forward in the remainder of North Lincolnshire shall be guided by the Strategic Flood Risk Assessment for North Lincolnshire and North East Lincolnshire. This will ensure that proposals include site specific flood risk

assessments which take into account strategic flood management objectives and properly apply the Sequential and, where necessary, Exception Tests.

In addition, development will be required, wherever practicable, to incorporate Sustainable Urban Drainage Systems (SUDS) to manage surface water drainage. The Council will also seek to reduce the increase in flood risk due to climate change through measures to reduce carbon dioxide emissions.

Material Considerations

7.7 **Housing and Employment Land allocations DPD (adopted 2016)**

Policy BRIE-1 Former Brigg Sugar site

The site adjoins Brigg Power Station and is allocated for Class B1 (offices/light industrial), B2 (general industrial) and B8 (storage and distribution) uses. Although the power station does not form part of the allocation, it does fall within the Brigg settlement boundary, where there is a presumption in favour of sustainable development.

Extract from CS inset map 10. Brigg.

NPPF

7.8 The UK Governments primary planning policy document is the National Planning Policy Framework (NPPF), which was most recently updated in July 2021. It contains a number of relevant paragraphs.as follows:

7.8.1 Paragraph 11 contains a presumption in favour of sustainable development. For decision-taking this means that: approving development proposals that accord with an up-to-date development plan without delay. The proposal accords with development plan policy and should be approved without delay.

7.8.2 Paragraph 38 states that LPAs should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve planning applications for sustainable development where possible.

7.8.3 Paragraph 39 states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and

improved outcomes for the community. Centrica is committed to engaging early with the LPA and other key stakeholders.

7.8.4 Paragraph 41 states that the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure, the greater the benefits.

7.8.5 Paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. The site consists of previously developed land, as it was formerly part of Brigg power station. Re-use of this land, as proposed, will preserve greenfield land elsewhere and constitutes sustainable development.

7.8.6 Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

The Proposed Development represents an important component of the UK's strategy to reduce carbon dioxide emissions and improve stability of energy supply. Whilst not generating renewable energy in its own right, the proposed BESS plays an important role in supporting the efficient operation of renewable energy sources and ensuring that there is minimal wastage of energy generated.

An appeal decision in Bolsover District (APP/R1010/W/17/3172633) published in August 2017 acknowledged that Peaking Power Generation Plants can be classed as renewable / low carbon energy development, despite their reliance on non-renewable energy resources (natural gas) for their operation. This is summarised in the following excerpt:

"… as the appeal proposal is required to provide greater capacity and flexibility in the energy generation network the proposed generators could be described as 'associated infrastructure' that would support the move towards low carbon energy supplied increasingly by renewable energy developments. It seems to me therefore that on balance it is not unreasonable to conclude that the proposed development would constitute development required for the exploitation of sources of renewable energy."

7.8.7 Paragraph 158 states that *when determining planning applications for renewable and low carbon development, local planning authorities should:*

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

The proposal will significantly enhance the ability of renewable energy sources to contribute positively to the energy supply of the UK. The need for such facilities is clear. Furthermore, the impact of the development on its environment will be limited. The benefits of the scheme will clearly outweigh the disbenefits.

7.8.8 Paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. In this case, locations less likely to flood are not available, therefore, the proposal passes the Sequential Test. With regard to the Exceptions Test, there are clear economic, environmental and social benefits to be derived from the provision of more zero-carbon energy, which outweigh the flood risk. Therefore, both the Sequential and Exceptions tests are passed.

7.8.9 Paragraph 185 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

a) mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

Centrica will ensure that any noise from the development is minimised and the effect on residents is kept to an absolute minimum.

Emerging Local Plan

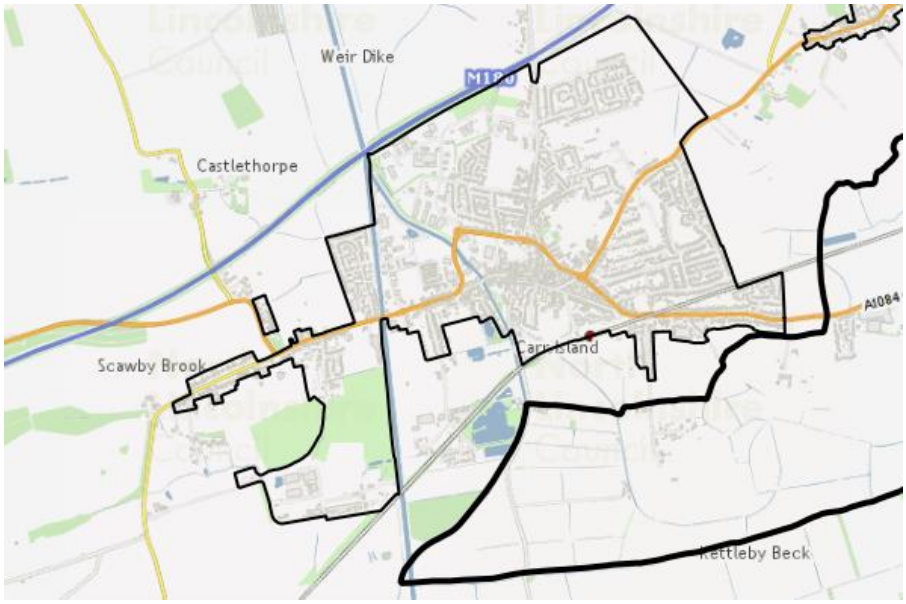
7.9 A new North Lincolnshire Local Plan (2020 to 2038) is being prepared. It has been through the following stages:

- Initial consultation (regulation 18)
- Issues and Options (regulation 19)
- Preferred Options (regulation 18)
- Publication draft (regulation 19)

7.10 The plan was the subject of a public consultation on a Publication Addendum, which only focused on proposed changes and modifications to boundaries on the Policies Map. Comments on these amendments were invited up to 11th July 2022. None of the proposed changes affected Brigg Power Station or the land surrounding it.

7.11 The next stage is the submission of the plan to the Secretary of state, which is scheduled to take place later in 2022. Then the plan will be the subject of an Examination, followed by Adoption in 2023.

7.12 It is noted that the publication draft of the new local plan proposals map still shows the Brigg power station site as lying within the development limit of the town of Brigg, which means that a presumption in favour of sustainable development on the site still applies.



Extract from emerging local plan proposals map.

Supplementary Planning Documents

Planning for Renewable Energy Development SPD (2011)

7.13 This document states that NLC will encourage proposals for renewable energy schemes. At the time of the report, the RSS target for NLC was the provision of 112MW of additional renewable energy, with 390MW in the pipeline. The development of a variety of renewable energy resources was encouraged, as the achievement of a greater diversity in the energy mix was seen as vital to ensuring energy security and continuity of supply, in a climate where fossil fuels continue to be depleted.

7.14 Renewable energy schemes can contribute to the reduction of greenhouse gases, helping to reduce climate change and its impacts. They can also have potential impacts on the following:

- Biodiversity
- Landscape
- Visual Effects
- Heritage Assets
- Soils and Hydrology
- Flood Risk
- Community Impacts
- Noise
- Shadow Flicker and Reflected Light
- Cumulative Effects
- Aircraft and Radar
- Telecommunications
- Highways and Rights of Way
- Local Grid Connections and Ancillary Equipment

7.15 This means that any planning application for renewable energy development, including the current proposal, will need to address the above listed issues.

SUDS and Flood Risk Guidance Document (2017)

7.16 This document explains that NLC is the Lead Local Flood Authority (LLFA) for the area, and it requires new development to control surface water run off to ensure that the risk of flooding is not increased. Surface water run-off rates should be limited for all new development to

greenfield runoff rate. Mitigation measures are set out in the document and NLC's requirements SUDS are required for all developments.

7.17 Overall, this means that any development must include proposals for SUDS, in order to ensure that surface water runoff problems are not created or worsened by the development.

8. PLANNING APPRAISAL

Principle of Development

8.1 Section 38 of the Planning and Compulsory Purchase Act 2004 and section 70 of the Town and Country Act 1990 requires that planning applications must be determined in accordance with the relevant development plan, unless material considerations indicate otherwise.

8.2 The development plan consists of saved policies of the NLLP 2003, policies of the NLCS 2011 and the HELA 2016. Key CS policies are as follows:

- Policy BRIE-1 (Former Brigg Sugar) designates an adjoining site for a range of employment uses.
- Policy DS21 (Renewable Energy) allows for development which generates renewable energy provided proposals are assessed appropriately in terms of their impact on amenity, character and environment.
- Policy CS1 states that new employment development should be focused on larger towns such as Brigg.
- Policies CS2 and CS3 encourage most development to be located with settlement limits. The site lies within the development limits of the town of Brigg, where there is a presumption in favour of sustainable development.
- Paragraph 11.21 encourages low carbon energy development.
- Paragraph 11.22 states that Brigg power station will continue to generate energy for the National Grid.
- Policy CS18 supports development that will help to provide renewable energy and help to minimise carbon emissions to combat climate change.

8.3 The NPPF is a material consideration, and the proposal complies with paragraphs of the NPPF, which seek to encourage sustainable development (para 11); encourage social, environmental and economic benefits (para 38); make better use of previously developed land (para 119); and encourage a transition to low carbon energy, whilst reducing CO2 emissions to combat climate change, including support for “associated infrastructure” including battery storage of renewable energy (para 152).

8.4 In this context, it is clear that the proposal will comply with key policies of the CS, which seek to concentrate development, including economic development, within larger towns, such as Brigg. The proposal will also comply with policies, which encourage the best use of previously developed land and the provision of economically positive development that also helps to combat climate change through the introduction of new technology.

8.5 Consequently, it is considered that the principle of the proposal is acceptable, and it complies with relevant development plan policies, as well as material considerations in the NPPF. Pre-application advice, from planning officer Jess Hill, confirmed that the principle of the proposed development is considered to be acceptable.

Impact on the character and appearance of the area

8.6 The area containing the site is relatively flat and open, especially to the west and south. To the north and east, the site lies on the edge of, but within the town of Brigg. The proposal is for a number of relatively modest battery units, placed on concrete plinths, immediately adjoining the much larger turbine hall of Brigg power station. Views of the proposed units from the south will be completely blocked by the power station building. From the north, the units will be viewed against the backdrop of the existing power station building. Overall, it is considered that the proposed BESS units will have a minimal impact on the character and appearance of the local area.

8.7 Pre-application advice from Jess Hill stated the following:

“The proposed BESS would be placed on a large area of the site and would have an impact on the appearance of the area. However, given the context of the site, including its industrial nature and the location of much larger buildings already in place, it is considered that the

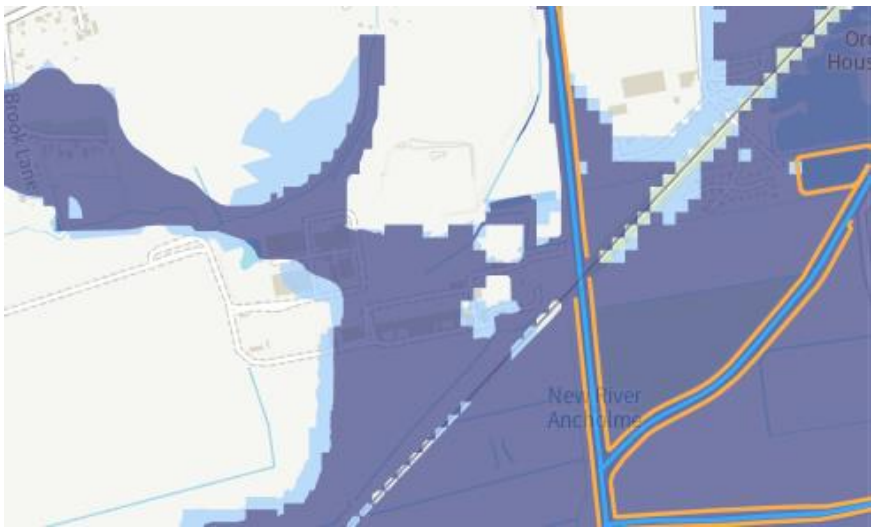
proposals would not have an unacceptable impact in terms of the character and appearance of the area".

Impact on the amenities of neighbours (noise)

8.8 The area containing the site is relatively remote from any dwellings. The nearest dwellings are located some distance away from the site, to the north-west, north and north-east. The small size of the units means that they will not have a material visual impact on the nearest residents. However, there is a slight risk that the fans used to cool the units, especially in the summer when people may have their windows open, could have an effect on the amenities of residents. For this reason, we have commissioned a noise survey, which has modelled potential worst case future noise levels from the development and calculated the likely impact on the nearest noise sensitive receptors (NSRs). The report concludes that the noise impact of the proposal on the amenity of the nearest dwellings is likely to be low and, therefore, no adverse impacts are likely to occur at any of the NSRs. Consequently, it is considered that residential amenity is not likely to be harmed by the development. More details are contained within the Noise Impact Assessment, which is submitted with this application.

Flood risk and drainage

8.9 It is acknowledged that the site lies within an area at risk of flooding, as it is located to the west of the river Anchombe.



Extract from EA Flood Map (light blue = FZ2, dark blue = FZ3).

8.10 It is acknowledged that sites in Flood zones, development has to address policy CS19, which states that, in high-risk areas, development will only be permitted if it meets the following prerequisites:

1) It can be demonstrated that the development provides wider sustainability benefits to the community and the area that outweigh the flood risk. In this case, the proposed benefits are considerable, in that the BESS will enable better use of renewable energy, which will help to reduce carbon emissions and reduce the risk of climate change.

2) The development should be on previously used land. In the case, the proposal is to be sited on previously developed land.

3) A Flood Risk Assessment has demonstrated that the development will be safe, without increasing flood risk elsewhere by integrated water management methods into the development. In this case, FRA and SUDS proposals have been commissioned and they will be submitted with a planning application in due course.

8.11 In this instance, the FRA states that the site is at moderate risk of fluvial and surface water flooding. In order to mitigate any risk, the equipment will be raised above the model predicted flood level, which will be achieved by siting the electronic equipment on plinths that will be raised 300mm above the anticipated flood level. In addition, an infiltration blanket, consisting of gravel and associated sub-base underlined by geotextile drainage blanket is proposed to store surface water. These features will also provide water quality benefits

8.12 In addition to the above, paragraph 159 of the NPPF states that development in flood zones should pass both Sequential and Exceptions Tests. With regard to the Sequential Test, the site is previously developed land within the settlement of Brigg, where there is a presumption in favour of development. Therefore, the Sequential Test is passed. With regard to the Exceptions Test, the small potential effects of the development in the flood zone, will be significantly offset by the considerable environmental and economic benefits of providing the BESS, which will increase the contribution to the UK's energy supply from renewable energy sources. Therefore, the Exceptions test is passed.

8.13 Overall, it has been demonstrated that the Project will be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk will be achieved through surface water management, such that the requirements of policy CS19 will be achieved.

Biodiversity

8.14 It is acknowledged that policy CS17 seeks to promote the effective stewardship of the areas wildlife. In this case, we have commissioned an Ecological Appraisal Phase 1 and protected species scoping, which HAS reviewed the potential risks to protected habitats and species and recommended any actions that may need to be taken to ensure the successful stewardship of local flora and fauna.

8.15 The Ecological Appraisal found that there is a single statutory designated site for nature conservation value within 2km of the site, which is the Castlethorpe Tufas SSSI, located 1.4km from the site. It is designated for geological features and there would be no impact on this or any other statutory sites from the proposals.

8.16 Six non-statutory sites are located within the 2 km search radius of the site. The closest of these is New River Ancholme Local Wildlife Site (LWS), located 0.2 km to the east of the site boundary. The next closest is Old River Ancholme LWS, located 0.35 km from site.

8.17 Pollution prevention measures should be adhered to in order to avoid any potential impacts on nearby designated sites and adjacent habitats during construction, formalised via production of a Construction and Environment Management Plan (CEMP), which can be required by the LPA by means of a suitable condition on the consent notice. No other potential impacts on designated sites or habitats would occur.

8.18 The proposed works have the potential to impact nesting birds, great crested newts and barn owl. As such, Great Crested Newt (GCN) and barn owl surveys were undertaken to confirm the presence / absence of these protected species.

8.19 No terrestrial habitats suitable for use by GCN are present within or adjacent to the site boundary and eDNA results for the ponds in close proximity were negative. GCN are therefore unlikely to be present on site and no mitigation is required.

8.20 The buildings and ancillary connections such as pipework / ducting were considered to offer potential nesting habitat for a range of bird species. Under current proposals, where these features require removal, it is recommended to be carried out outside of the nesting bird season.

8.21 Barn owl were not found to be utilising the site, but are present on the wider power station site, as such a pre-commencement barn owl survey should be undertaken to confirm the continued absence and ensure no disturbance occurs during the construction phase.

8.22 Opportunities to enhance the site are limited due to the small scale and industrial nature of the site, but opportunities for biodiversity improvements such as wildflower planting, sympathetic vegetation management, and the incorporation of bat and bird boxes onto retained trees / boundary features is potentially possible on the wider power station site. The provision of such features could be conditioned by the LPA, if they are considered to be necessary.

Ground conditions

8.23 An initial review of the available information for the site indicates that it is underlain by a Secondary A Aquifer relating to alluvium, Secondary A Aquifer relating to the Thorncroft Sand

Member and Principal Aquifer to the Hibaldstow Limestone. The site is not indicated to be located in a groundwater Source Protection Zone (SPZ) although there is one nearby groundwater abstraction for process water indicated at 154 m to the northwest of the site which appears to be associated with the Brigg Renewable Energy Plant. The nearest surface water feature is the New River Ancholme which is located at approximately 120 m to the east of the site.

8.24 Based on the Preliminary Risk Assessment, RPS considers that further assessment is necessary to determine whether mitigation measures are required to manage the risk associated with ground contamination when the proposed end use of the Assessment site is considered. The outline CSM produced upon completion of the desk study assessment has identified a number of potential pollutant linkages that may be active upon the redevelopment of the site.

8.25 It is therefore recommended that the potential for these linkages to be active is assessed through a Phase 2 Environmental Site Investigation. The investigation should be targeted to provide information on:

- The concentrations of contaminants of concern (if present) within the soils beneath the site;
- The concentrations of contaminants of concern within shallow groundwater (if present); and
- The ground gas regime beneath the site.

It would be prudent to combine any site investigation undertaken for environmental purposes with geotechnical testing, in order to facilitate preliminary foundation and pavement design.

8.26 It is considered that the LPA could control the carrying out of further survey work through the imposition of appropriate conditions on the consent notice. These would require the submission of further survey results, for approval by the LPA, prior to commencement of development on the application site.

Transport

8.27 It is acknowledged that the construction and operation of a BESS on this site is likely to generate a relatively small number of vehicle movements. During construction, a relatively small number of HGV's and staff vehicles will access the site and use the local highway network. Access to the BESS site during construction and operation will be from the west onto the B1206 Scawby Road using the power station access junction. There will not be any new full-time employees on the site when the BESS is operational and on this basis, it is unlikely that many traffic movements will be generated during this stage of the development.

8.28 In this context, we have submitted a Construction Traffic Management Plan (CTMP) with this planning application, which was requested by the planning officer at the pre-application stage. The CTMP sets out proposed access routes to avoid unsuitable roads and road works. The CTMP confirms that the developer will appoint a site manager who will undertake transport co-ordination to ensure there is adequate liaison between the site and local authorities, neighbours and other stakeholders. The site manager will ensure that vehicles follow agreed routes and park in appropriate areas on the site. The design of the compound will allow for vehicle turning to make sure that HGV's exit the site in a forward gear. Dust and dirt will be controlled at all times. A complaints procedure will be put in place to ensure that any complaints are resolved promptly.

8.29 A construction travel plan will be instigated, to ensure that trip generation is kept to a minimum. Car sharing will be encouraged. Workers living locally will be recruited as much as possible. Use of public transport for journeys will be encouraged. A booking system will be used to make sure that deliveries are managed efficiently. These measures, and others described in the CTMP in more detail, will be employed to ensure that the environmental impact of the construction period of the development, is kept to a minimum.

9. CONCLUSIONS

9.1 Overall, it is considered that the need for the proposed BESS, which will help the UK to more sustainably meet its energy needs, is undeniable as set out by Government energy policy and national planning policy. This type of development is encouraged at International, UK Government and local government levels. The proposed BESS will help to ensure that the UK's energy security is improved in an uncertain world, and it will help to address the threat of climate change by reducing our reliance on fossil fuels, in line with the Governments legally binding target of achieving Net Zero by 2050. The proposed BESS will also assist with the efficient operation of the energy system, though enabling a balance between supply and demand, and help to manage costs resulting in lower energy bills overall for consumers.

9.2 The proposal site is previously developed (brownfield) land, with a planning history of energy generation being located directly adjoining the northern elevation of the Brigg power station turbine hall. The site also lies within the settlement boundary of one of the largest towns in the area, Brigg, where there is a presumption in favour of sustainable development.

9.3 The site is well screened from the south by the power station buildings, while from the north the proposed units will be viewed against the backdrop of these same buildings. The relatively small dimensions of the energy storage units (when compared to the power station buildings) will ensure that they are not visually obtrusive, and the character and appearance of the local area will not be harmed by the development.

9.4 A noise survey has been undertaken, which demonstrates that the proposal will not harm the amenities of the closest receptors (dwellings). FRA and SUDS reports have been prepared, which demonstrate that the moderate flood and drainage risks can be mitigated. A Phase 1 ecology report, as well as GCN and barn owl surveys, has been undertaken, demonstrating that the issue of impact upon biodiversity can be mitigated. A ground conditions survey has been undertaken, which recommends further work, to be secured and controlled by the LPA by means of conditions on the consent notice. A CTMP has been prepared to ensure that access and parking during the construction phase of the development is satisfactory. Few vehicle movements are expected during the operational phase. All of these issues can be controlled by the LPA by means of conditions, if it is deemed to be necessary.

9.5 The council's pre-app letter concluded that:

The principle of providing the battery storage system in this location is considered suitable given the site comprises previously developed land, is adjacent to a large-scale industrial building and is also within the development limits of Brigg. The site is therefore influenced by the surrounding development which will reduce the visual impact of the proposals.

There are certain sensitivities associated with the site, and it is not yet clear from the submitted information specifically how these matters will be addressed (ecology / drainage). The planning application should be supported by the relevant plans and documentation to ensure the proposals are acceptable in terms of the impact on amenity, biodiversity and drainage, in addition to complying with relevant polices from the development plan and NPPF.

9.5 Overall, having reviewed and acted upon the pre-application advice from the council, it is considered that the proposal complies with all relevant development plan policies and material considerations, such that planning permission should be granted as expeditiously as possible given the urgent national need for improved utilisation of renewable energy. However, if any further information or clarification is required, please do not hesitate to contact the author.