



LAND SOUTH OF WAKEFIELD B SUBSTATION AND EAST OF NEIL FOX WAY, WAKEFIELD, WF1 5DB

Proposed Energy Storage Facility

**PLANNING STATEMENT
(INCLUDING VERY SPECIAL CIRCUMSTANCES
STATEMENT)**

June 2022



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/1 INTRODUCTION

- 1.1. PWA Planning is retained by Harmony Energy Storage Limited ('the applicant') to submit a planning application for the development of an energy storage facility ('the proposed development') on land to the immediate south of Wakefield B Substation, east of Neil Fox Way, Wakefield, WF1 5DB ('the site').
- 1.2. Harmony Energy specialise in developing and operating wind, solar and utility-scale battery energy storage projects. Founded more than ten years ago, Harmony Energy have a track record of delivering projects working closely with landowners from the outset, to ensure financial and environmental benefits are maximised with attractive, long-term income opportunities, bearing all development costs and project responsibility.
- 1.3. This planning application is made to Wakefield Council ('the Local Planning Authority') as a full planning application and relates to the red edge application site boundary defined on the Location Plan submitted in support of this application.
- 1.4. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This Planning Statement will demonstrate that the proposals accord with the provisions of the relevant policies of the Development Plan, and moreover that there are other significant material considerations which indicate that planning permission ought to be granted. In addition, the statement will seek to demonstrate that there are no technical reasons which could hinder the grant of planning permission.
- 1.5. This Planning Statement, alongside a review of the site history and relevant policies, provides a description of the proposed development together with an appraisal of the planning merits of the scheme as a whole.

1.6. This statement should be read in conjunction with the submitted application package, which includes the following documents and is in line with the documents requested by the LPA at the Pre-Application stage:

- 1 APP form, relevant certificates and notices;
- Drawn Information:
 - Location Plan (ref. PA_WF_LP_Rev E)
 - Existing Site Plan Rev C(Sheets 1 and 2) (ref. PA_WF_ESP (1) Rev C and PA_WF_ESP (2) Rev C)
 - Proposed Site Plan (Sheets 1 and 2) (ref. PA_WF_PSP (1) Rev K and PA_WF_PSP (2) Rev K)
 - Existing Sections/Elevations (ref. HES_021_Wakefield B_Layout – Existing Site Elevations_Rev 0)
 - Proposed Site Sections/Elevations (ref. HES_021_Wakefield B_Layout – Site Elevations_Rev B)
 - Parameters Plan (ref. PA_WF_PPP Rev A)
 - Equipment Elevations
 - Battery Elevation (ref. WB-EL-BAT-01)
 - Battery Transformer Elevation (ref. WB-EL-BTR-01)
 - Aux Transformer Elevation (ref. WB-EL-AUX-01)
 - Customer Switchroom Elevation (ref. WB-EL-CSR-01)
 - Storage Container Elevation (ref. WB-EL-STO-01)
 - CCTV Elevation (WB-EL-CCT-01)
 - Security Fence Elevation (WB-EL-FEN-01)
 - 33kv transformer compound (WB-EL-TRN-01)
- Design and Access Statement
- Landscape and Visual Assessment
- Landscape Masterplan (refs. UG_1474_LAN_GA_DRW_01 P04, UG_1474_LAN_SL_DRW_02 P03, UG_1474_LAN_SL_DRW_03 P03 and UG_1474_LAN_SL_DRW_04 P03)
- Heritage Assessment

- Flood Risk Assessment and Drainage Strategy
- Transport Statement
- Tree Survey and Arboricultural Impact Assessment (including Arboricultural Method Statement and Tree Protection Plan)
- Ecological Assessment, Biodiversity Management Plan and Biodiversity Net Gain Assessment
- Construction Environmental Management Plan
- Noise Assessment
- Land Contamination Assessment
- Sustainability and Renewable Energy Statement
- Statement of Community Involvement

1.7. The required Green Belt – Very Special Circumstances Statement is included within Section 6 of this Planning Statement.

/2 SITE DESCRIPTION

- 2.1. The application site extends to approximately 7.2ha. It is irregular in shape and currently comprises an undeveloped agricultural field, located to the south and east of the Wakefield B Substation. There are no existing buildings on site.
- 2.2. Oakenshaw Brook runs along the western boundary of the site, beyond which lies mature trees which comprise a 'Wildlife Corridor' and Neil Fox Way (A6194), which runs in a north to south direction. To the southwest of the site lies a traveller's caravan site. The remainder of the site is surrounded by agricultural land.
- 2.3. A location plan showing the site within its immediate setting is submitted with this application, and the site is outlined below in Figure 1.



Figure 1: Application outlined in red (Source: Google Earth, not to scale)

- 2.4. The site is currently accessed through an existing opening on the eastern boundary of the field in which the site sits.
- 2.5. The site is set back from Neil Fox Way by approximately 100 metres. Although the surrounding area is generally rural / agricultural, the settlement of Belle Vue is approximately 500m to the west of the site, whilst the town of Wakefield is approximately 4km to the northwest of the site. To the west of Neil Fox Way is a large area designated for development. To the northeast is the small settlement of Heath, also known as Heath Common.
- 2.6. The site is located outside of defined development limits. The Council's Local Plan designates the site as being within the Green Belt and a designated Historic Landscape.
- 2.7. Heath is a conservation area in which most of the buildings (c 45) are listed, including the Grade I listings of Heath Hall, the Stable House, Bewhouse and East Pavilion at Heath Hall, and the West Pavilion. There are also a number of Grade II* listed buildings, including Heath house, the Stable Building/Barn at Heath Hall and The Dower house. The closest listed buildings to the site are the Grade II* listed Dame Mary Bolles Water Tower which is located adjacent to the northern boundary of the site, the Grade II listed Boat Yard House located approximately 50m to the south and the Grade II listed The Whittling Well approximately 50m to the east of the site.
- 2.8. With regards to flood risk, the site is located entirely within Flood Zone 1 in accordance with the Government's Flood Map for Planning. Land to the immediate west of the site is within Flood Zone 2 and 3.
- 2.9. Figure 2 below shows the site in its wider context.



Figure 2: Approximate site location circled in red (Source: Google Earth, not to scale)

Planning History

- 2.10. From a review of the LPA's website, there does not appear to be any previous planning applications associated with the site.

Pre-Application Advice

- 2.11. The LPA were contacted in August 2021 and formal pre-application advice was requested. A meeting with the LPA was held in November 2021, followed by a formal written response on 21st December 2021. This response is provided as Appendix A.
- 2.12. The written response advised that the development put forward at the pre-application stage comprised inappropriate development in the Green Belt and as such could only be approved by the demonstration of very special circumstances. The response also stated that the development will harm heritage assets.

- 2.13. The response went on to acknowledge, as discussed with the LPA at the meeting which was held, that it may be possible to make a case that very special circumstances exist if both harm associated with the development is reduced to the lowest possible level and convincing and compelling evidence is provided that the proposed development is needed to meet a need for energy storage capacity which could not be met by developing a less sensitive site elsewhere.

/3 PROPOSED DEVELOPMENT

- 3.1. The proposed development comprises of an energy storage facility contained within a fenced compound. Access would be taken from an existing point of access in the northeast corner of the field, via a permanent track to be constructed in a natural looking material. The layout of the proposed development is shown in the Proposed Site Layout Plan (Sheets 1 and 2). A comprehensive landscaping scheme has been provided which surrounds the compound (plans ref.UG_1474_LAN_GA_DRW_01 P04, UG_1474_LAN_SL_DRW_02 P03, UG_1474_LAN_SL_DRW_03 P03 and UG_1474_LAN_SL_DRW_04 P03).

- 3.2. Submitted in addition to the above plans is a Parameters Plan (ref. WF_PPP_Rev A) which seeks to allow some flexibility in the specification of and the layout of the equipment within the compound. The Parameters Plan specifies that across the majority of the site, equipment heights would be up to 3.5m. This covers the battery containers, transformers and some ancillary equipment. The equipment associated with the 33kv transformer would have heights up to 8m, which applies only to one part of the equipment as shown in plan ref. WB_EL-TRN_01. The submitted layout is based on Tesla equipment for illustrative and consenting purposes. It is however requested that the final layout and specification of equipment is agreed by condition since at this stage it is not certain who the battery supplier will be. Final equipment will be decided post-consent following a competitive tendering process which is the norm for large scale renewable energy projects such as this. It should also be noted that this type of technology is constantly being innovated and made more efficient and therefore flexibility allows for change in advancements between consent and build. PWA Planning would be happy to discuss this issue in more detail once the application is underway and provide an example condition in this respect.

- 3.3. The layout provided shows that equipment within the compound comprises of 60no. high efficiency battery energy storage units housed within individual containers. The containers are arranged in pairs in two rows and each have a maximum height of 3.5m. For each pair of battery containers, a transformer unit (30no in total) is proposed, at a

maximum height of 3.5m. In addition, there will be two customer switchgear customer rooms with a maximum height of 3.5m located close to the western boundary of the compound, alongside 2no. auxiliary transformers with a maximum height of 3m. The main transformer for the site is to be located in the northwest corner of the site. This equipment would have a maximum height of 8m, which applies to one part of the equipment as mentioned above. 2no. storage containers are proposed in the south-east corner of the site for use during operation of the site, which would have a maximum height of 2.8m. 7no. car parking spaces are proposed, 3no. along the western boundary and 4no. in the south-east corner of the site. The surfacing within the compound would be type 1 aggregate, with a harder sub-base of the internal roads. Equipment would be placed on individual concrete plinths. As above however, it should be noted that the final number of units and containers will be determined post-consent as each battery supplier has slightly different configurations and energy export potential per battery unit. The overall export value of 99.9MW will not be exceeded however and all equipment would be contained within the compound area applied for.

- 3.4. The compound will be surrounded with a 2.4m high security fence, colour to be agreed with the LPA. CCTV cameras are proposed at points around the site for additional security. An acoustic fence of 3m in height is proposed along the western boundary of the site to provide noise attenuation. The need for this fence is explained in the accompanying Noise Assessment.
- 3.5. The access track between the highway and the compound would be a permanent track constructed in a natural looking material, chosen to minimise the impact of the track on the wider field in line with comments received from the LPA at the Pre-Application stage.
- 3.6. A SuDs basin is proposed to the southwest of the compound, as detailed in the Drainage Strategy submitted alongside this application.
- 3.7. A comprehensive landscaping scheme has been proposed for the site. This includes swathes of wildflower meadow, native woodland mix planting, interspersed with native trees. This scheme has been developed not only to effectively screen the development and mitigate visual impacts, but also to provide a betterment in terms of the screening

of the existing Wakefield B substation located to the north of the site. For this reason, the red line boundary of the site was extended to allow this additional planting as part of the proposals. As detailed in the Ecological Appraisal and Biodiversity Net Gain assessment, the proposed development would result in an overall net gain of 141.34% (20.92) Habitat Units.

- 3.8. The batteries would be charged solely from renewable energy sources (predominantly wind and solar energy). This would be guaranteed as electricity and will be acquired through a Power Purchase Agreement with a well-established UK energy supplier.
- 3.9. The connection between the proposed equipment and the substation located to the north of the site will be made via underground cable as shown in the proposed Site Layout Plan.

/4 TECHNICAL CONSIDERATIONS

4.1. It is considered that the proposed development can be implemented without significant adverse impacts arising from any site constraints or environmental issues. A number of technical assessments have been undertaken which are summarised below and which should be read in conjunction with the full reports as referenced.

Ecology

4.2. An Extended Phase I Habitat Survey and desk-based assessment have been undertaken, the results of which are presented within the Ecological Assessment provided with this application.

4.3. The site does not form part of any designated site for nature conservation and there are no such sites in close proximity. There are some statutory sites in the wider area, however it is not considered that there is any potential for likely significant effects on these sites.

4.4. The development has been designed to avoid existing features such as hedgerows, woodland and Oakenshaw Beck to the west. Habitats which will be directly affected by the construction of the development are relatively small areas of arable and semi-improved grassland. Such farmland is ubiquitous within the local landscape and the loss of these areas are unlikely to significantly impact local wildlife. Significant benefit to local wildlife will be achieved through the addition of approximately 3.4ha of species-rich scrub and approximately 1ha of species diverse grass which will help to create wildlife corridors within and around the site, improving the functionality of habitats for birds, mammals, amphibians, reptiles and invertebrates. An overall biodiversity net gain of 141.34% is expected as a result of these measures.

4.5. Biodiversity management and enhancement measures are described further in the Biodiversity Management Plan (BMP) which has been submitted alongside this application.

- 4.6. With regards to protected species, there are four ponds located within 250m of the site which have been assessed as having suitability for great crested newts. It was not possible to survey these, however records show that there are GCN in the vicinity and therefore presence has been assumed. It has been concluded that the proposed development is unlikely to impact GCN or impact the amphibian population in the locality. Reasonable Avoidance Measures are therefore considered appropriate and would be implemented during the construction phase to safeguard this species, and any reptiles which might be impacted.
- 4.7. No badger setts or evidence of badgers were found on site and pre-construction checks will suffice to ensure there are no unacceptable impacts on this species.
- 4.8. Bats are not expected to be impacted by the proposals. Construction activity would be undertaken during daylight hours with any temporary lighting directed towards working areas and away from hedgerow and woodland. During operation, the only lighting needed is emergency lighting, which once installed would also be directed away from hedgerow and woodland.
- 4.9. No evidence of otters were identified in the site, although they may be present in the adjacent beck. During construction, excavations and trenches will be minimal and would be covered overnight to prevent otter entrapment. Standard measures to ensure runoff control and pollution prevention will be implemented during construction.
- 4.10. With regards to water voles, as construction activities will be in excess of 5m from the top of the riverbank. Again, standard measures to ensure runoff control and pollution prevention will be implemented during construction.
- 4.11. Works will be undertaken out of the bird breeding season to ensure no impacts in this respect. If this is not possible, any suitable habitats would be checked before development commences by a suitably experienced ecologist.

Landscape and Visual Impact

- 4.12. A Landscape and Visual Appraisal (LVA) has been prepared to assess the impact of the proposals on landscape character and visual amenity. The LVA describes the existing landscape and views and considers their sensitivity to change and identifies changes likely to arise from the proposed development.
- 4.13. The LVA finds that the proposed development has been laid out to largely retain the existing landscape features, including the mature trees and vegetation to the site boundaries, avoiding new built development in the most sensitive parts of the site. The existing mature boundary vegetation will be enhanced with extensive additional tree planting, native shrubs and species rich wildflower meadow where appropriate, in response to the visibility of the southern and eastern areas of the site, the layout has been developed to locate the areas of built form within the central and western portions of the site in order to reduce the amount of development within this sensitive area. Effects are anticipated to reduce over time as the proposed planting matures.
- 4.14. The LVA identifies a number of impacts, which are inevitable with any development. Moderate adverse effects are anticipated in relation to the loss of the existing field parcel within the site with moderate and minor beneficial effects anticipated in terms of the new proposed native vegetation and water features within the site. Minor to negligible adverse effects are anticipated to landscape character. These effects will be borne in an area that has an extensive relationship with the adjacent urban fringe to the west and the energy infrastructure to the north and will be offset by the new landscape scheme. Minor effects are anticipated to the setting of the heath Conservation Area and Dame Mary Bolles Tower. Visual effects are anticipated to range from negligible through to moderate adverse on a limited number of visual receptors as a result of the change in the character and amenity of the view as a result of the change (from arable field to that of the proposed development set within a new landscape structure). Effects on visual receptors will diminish over time as the planting within the green infrastructure area matures.

4.15. In summary, the LVA finds that the proposed development will sit within the existing landscape character without causing significant harm. Whilst some negative landscape and visual effects will arise from the proposed development as it emerges, the development of the site is sensitively located and is visually well-contained. Furthermore, the landscape and visual effects are limited to the assessment site and local level receptors only immediately adjacent to the site.

Trees

4.16. A tree survey of the site was undertaken which helped to inform the design of the proposed development. An Arboricultural Impact Assessment has been provided which demonstrates that there will be minimal tree removal in two areas; a section of a group of category B trees in order to install the cable connection, and the removal of one tree to allow for access at the site entrance. Additionally, the pruning of one category B tree is required to lift the crown of a retained tree at the entrance.

4.17. Within the AIA, a Tree Protection Plan has been provided which details the trees which will be retained and protected during construction and operation of the site. An Arboricultural Method Statement has also been submitted within the AIA which provides the working methods required to ensure protection of retained and protected trees.

4.18. The AIA finds that the landscaping proposed would deliver a considerable improvement in biodiversity and tree cover, which will more than adequately compensate for the development-related tree losses.

Highways and Transport

4.19. A Transport Statement (TS) has been prepared to assess the impact of the proposed development on the local and wider highway network and to assess the safety and suitability of site access arrangements.

4.20. Access to the site will be via the existing field entrance off Kirkthorpe Lane. Swept Path Analysis has been undertaken to establish whether the largest vehicle proposed to access the site - an Abnormal Indivisible Load Vehicle (AILV) - can adequately navigate

the construction access route. The results of the SPA demonstrate that the test vehicle can adequately navigate Kirkthorpe Lane and the proposed access junction and internal access road. The results also show that an AILV can adequately access/egress the site via Kirkthorpe Lane.

- 4.21. It should be noted that the majority of delivery vehicle movements are expected to be made by vehicles of a smaller size than that tested within the SPA. Given an AILV can traverse the access route, there are no issues with smaller vehicles doing the same.
- 4.22. It is estimated that a total of 400 two-way heavy commercial vehicle (HCV) movements will be generated during the construction period. The maximum number of construction staff on-site will vary subject to the construction schedule, with staff trips being made by cars, minibuses or vans / small light commercial vehicles. The construction period is expected to last for 16 weeks.
- 4.23. Once the site is operational, approximately 12 trips per year will be made to the site to support site operations and general maintenance activities. These visits will typically be made by LCVs and space will be retained on site to allow these vehicles to turn around, ensuring they can enter and exit the site in forward gear.
- 4.24. It is considered that the projected operational vehicle trip generation associated with the proposed development does not represent a significant amount of movement, with a low number of daily/peak hour movements associated with construction. It is concluded from the assessment that the proposed development would not be expected to have a detrimental impact in terms of sustainable travel, road safety and traffic impact.

Flood Risk and Drainage

- 4.25. A Flood Risk and Drainage Assessment has been provided for the proposed development. It was noted early in the design process that further assessment was required to determine flood risk to the site in respect of the potential for fluvial flooding

from Oakenshaw Beck to the west of the site, and of surface water flooding from upgradient overland flow.

- 4.26. The proposed site is located within Flood Zone 1, outside of the 1 in 1,000 year flood extent from Oakenshaw Beck. As such, the risk of flooding from for fluvial sources is considered to be low.
- 4.27. With regards to surface water flood risk, the drainage strategy proposed to install upgradient cut-off ditches to manage this and ensure that no upgradient flows are able to shed into the development areas but instead are formally intercepted and discharged down gradient to the Oakenshaw Beck. Accordingly, the proposed drainage strategy will mitigate the risk from upgradient surface water runoff and therefore there is a residual low risk of surface water flooding.
- 4.28. The FRDA assesses the potential increase in surface water runoff attributed to the proposed development and proposed a surface water management strategy to manage this. The strategy is in accordance with sustainable drainage principles and allows the site to remain free of flooding during design storm events, whilst ensuring no increase in flood risk to offsite receptors and ensures no deterioration of the water environment. The proposed drainage/SuDS scheme for the proposed development will comprise the management of surface water runoff from the battery storage development platform, proposed access track and intercepted surface water catchments upgradient to these proposed development areas.
- 4.29. The FRDA concludes that it is considered there is no impediment to the development proposals being granted planning permission on the grounds of flood risk and drainage provision.

Historic Environment

- 4.30. A Heritage Assessment has been undertaken which considers the potential impact of the proposed development. The assessment looks at the impacts in terms of the archaeological potential of the site, and considers the impacts on designated and undesignated heritage assets in the area.

- 4.31. With regards to archaeology, the assessment finds that within the footprint of the development, direct impacts on the likely buried remains of previously identified ridge and furrow earthworks of medieval and post-medieval date. A low potential for other archaeological deposits unrelated to the ridge and furrow has been identified. It is considered that a programme of archaeological evaluation and mitigation may be required as a planning condition in order to identify any previously unrecorded archaeological features that may be present on site.
- 4.32. A number of designated heritage assets are located within 1km of the site. Of these, three have been assessed as being adversely affected by the proposed development: the Historic Heath Landscape, the Heath Conservation Area and the Grade II* listed Dame Mary Bolle's Water Tower. These impacts are assessed as low adverse, which equates to 'less than substantial harm' in NPPF terms.

Noise

- 4.33. A Noise Assessment has been submitted in support of this application, which assessed the acoustic impact of the proposed development in relation to noise sensitive receptors in close proximity to the site. The scope of the assessment was agreed with the LPA beforehand.
- 4.34. The assessment comprises of the characterisation of the baseline noise environment through noise monitoring on site, prediction of operational noise levels, evaluation of predicted noise levels and specification of mitigation.
- 4.35. The predicted operational noise levels meet the required baseline derived criteria such that noise impacts will be low/very low at the closest noise sensitive receptors during the day and low at night. In order to meet these levels, an acoustic fence with a height of 3.7m along the western edge of the compound is proposed.

Land Contamination

- 4.36. A Phase 1 geo-environmental site assessment has been undertaken to assess the potential for land contamination on site and the risks this might pose as a result of the proposed development.
- 4.37. Geotechnical risks are considered to be low. Although the site is within a coal mining reporting area, it is considered to be at low risk for shallow coal workings. As site investigation is recommended to assess the underlying strata and determine foundation solutions.
- 4.38. The environmental risk associated with the site is also considered low. Intrusive site investigation is recommended to investigate the potentially infilled historic pond. Given the proposed commercial use, this is no risk to end-users. Possible risks will be associated with construction workers, which can be mitigated using appropriate PPE and welfare facilities.

/5 PLANNING POLICY CONTEXT

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.' These can include local circumstances, previous decisions and government guidance as set out in the National Planning Policy Framework (the Framework) (2021).

The Development Plan

5.2. The development plan for Wakefield Council comprises the Core Strategy and Development Policies document (both adopted in 2009), Site Specific Policies Document (2012) and the Leisure, Recreation and Open Space Local Plan (2012).

5.3. A new Local Plan is currently in preparation. The consultation on the Publication Draft Plan began at the end of October 2020 and ran until the end of December 2020. Following consultation on the Publication Draft Plan the Local Plan will be submitted to the Secretary of State for independent examination with adoption anticipated in 2022.

5.4. As per the Council's Policies map, the site is located within the Green Belt (pale green), a Wildlife Habitat Network (green hash) and is part of a wider Historic Landscape, known as Heath Historic Landscape (dark green outline). To the east is the Heath Conservation Area (orange outline) and to the west is a Special Policy Area (orange) designated for redevelopment. The green/brown line depicts the Settlement Boundary which the site sits adjacent to, and which encompasses the Wakefield B Substation to the north. It is also noted that the footpath to the southeast of the site is identified as Leisure Corridor LC6 (Trans Pennine Trail) on the Leisure, Recreation and open Space Local Plan Map (2017).

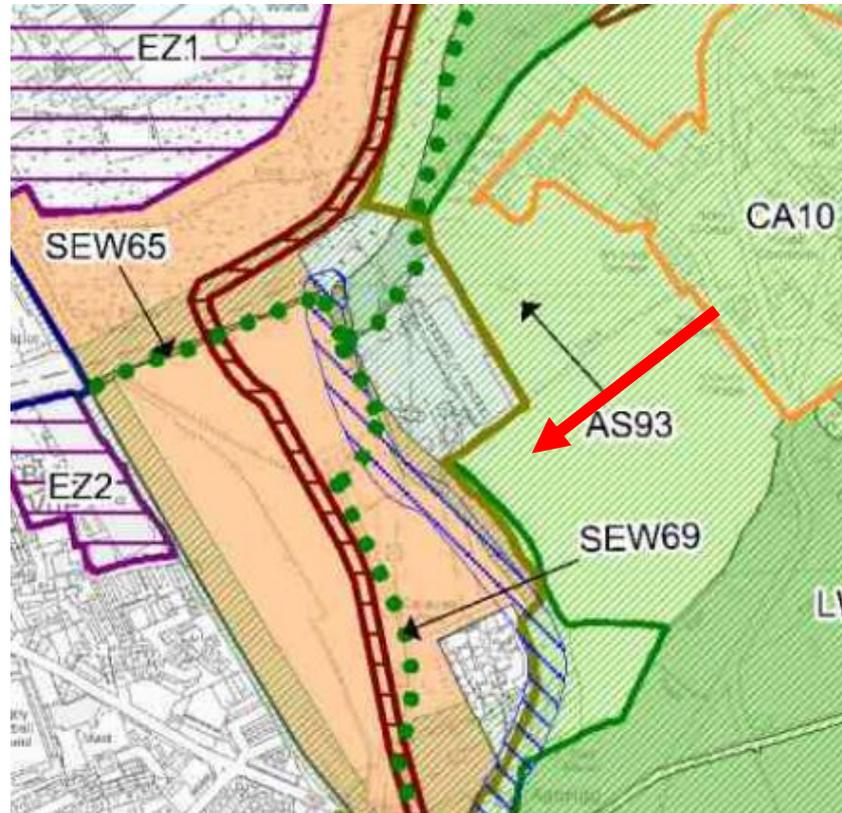


Figure 3: Extract of Policies Map, site depicted by red arrow

Core Strategy (2009)

5.5. The following policies of the Core Strategy are considered relevant to the proposals:

- **CS 1: Location of Development** states that within the Green Belt, development will conform to national, regional and LDF policies.
- **CS 9: Transport Network** seeks to ensure that development proposals will have access to the appropriate category of road to ensure that traffic can be managed effectively.
- **CS 10: Design, Safety and Environmental Quality** details that good design is a key element of sustainable development and also to protect and enhance the district's historic assets including historic landscapes.

- **CS 12: Green Belt** states that the general extent of the Green Belt defined on the Local Development Framework Proposals Maps, should remain unchanged. The policy goes on to state that:

"Only in exceptional circumstances where there is an overriding need to accommodate what would otherwise be inappropriate development, which cannot be met elsewhere and where Green Belt land offers the most sustainable option, will land be taken out of the Green Belt."

- **CS 13: Mitigating and Adapting to Climate Change and Efficient Use of Resources** details that development must mitigate the likely effects of climate change, including by taking measures to reduce carbon emissions. In order to achieve renewable generation targets, the Council will encourage the development of new sources of renewable energy where there are no adverse impacts on nearby communities.

Development Policies (2009)

5.6. The following Development Policies are considered relevant:

- **Policy D5 Ecological Protection of Watercourses and Water Bodies** states that development on or adjacent to watercourses and water bodies will not be permitted unless it can be clearly demonstrated that there will be no significant harm to any ecological features.
- **Policy D6 Wildlife Habitat Network** states that development which would adversely affect the integrity and value of the Wildlife Habitat Network will only be permitted if it can be demonstrated that reasons of public interest for the development clearly outweigh any significant harm.
- **Policy D7 Protection of Trees and Woodland** states that these features are important ecological assets. Development that would damage or result in the loss of trees, areas of woodland or hedgerows will only be permitted if it can clearly be demonstrated that the development cannot reasonably be located

elsewhere; that the need for the development clearly outweighs any harm to the ecological and landscape value of the area; and that harm can reduce to acceptable levels through the implementation of positive environmental mitigation measures.

- **Policy D8 Landscape Character** details that developments must contribute towards the protection, maintenance and enhancement of the character of the district's landscapes.
- **Policy D9 Design of New Development** requires that all new development be of a high standard. In order to maintain and enhance local diversity, the policy requires that all new development make a positive contribution to the environment and amenity of the local area by virtue of high-quality design, layout and landscaping.
- **Policy D12 Landscape Design** states that landscape is an important and highly valued environmental resource within the District. This policy requires that new development be designed so that important existing landscape features such as water bodies, trees, hedgerows, stone walls and other elements are incorporated into proposals.
- **Policy D14 Access and Highway Safety** seeks to ensure that developments can be accessed conveniently and safely.
- **Policy D15 Safety and Security Through Design** requires that development proposals shall be designed to ensure a safe and secure environment that reduces the opportunities for crime.
- **Policy D17 Development Affecting Archaeological Sites** seeks to protect Scheduled Ancient monuments and other unique archaeological assets. Where development proposals affect sites of known or potential archaeological interest, an appropriate archaeological assessment and evaluation will be required to be submitted.

- **Policy D18: Development Affecting Historic Locations** states that development likely to affect the district's Historic Parks and Gardens, Historic Landscapes and Conservation Areas will only be permitted where there is no impact on:
 - a) open spaces, views, landmarks and landscape that contribute to their character, appearance or setting;*
 - b) the character of any buildings or structures having regard to local scale, proportion, details and materials;*
 - c) the preservation of features of architectural, archaeological and historic interest.*
- **Policy D19 Development Affecting Buildings of Local Interest** seeks to protect the various buildings which are identified for protection because of their local significance. New development will be expected to have no adverse impact on the character, appearance and setting of these buildings.
- **Policy D20 Pollution Control** states that in order to protect public health and environment, development proposals which are likely to cause pollution will only be permitted where measures are implemented to satisfactory levels.
- **Policy D22 Contaminated Land** states that there are areas of the district where there are adverse ground conditions caused by unstable or contaminated land. This policy requires that development on or adjacent to land where there are adverse ground conditions will not be permitted unless it has been demonstrated that these conditions have been properly identified and treated safely.
- **Policy D24 Flood Risk** states that applications seeking development in Flood Risk Zone 2 and 3 should provide evidence of the Sequential Test.

- **Policy D25 Drainage** requires that surface water from new developments must be managed using sustainable drainage techniques, unless this is not technically feasible.
- **Policy D26 Protecting Agricultural Land** seeks to protect the most versatile agricultural land from irreversible development.
- **Policy D27 Renewable Energy Generation Technology** states that in order to meet regional and district targets for renewable energy, on site renewable energy generation is expected at a level commensurate with the size of the proposal.
- **Policy D28 Sustainable Construction and Efficient Use of Resources** requires that new development be energy and water efficient, including measures within the design to ensure this is maximised. This includes through the use of renewable technologies.

Leisure, Recreation and Open Space Local Plan 2016

5.7. The following policies of the LROS LP are considered relevant:

- **LROS 2 Green and Blue Infrastructure** states that proposals that help to conserve, sustain and enhance the district's green and blue infrastructure assets will be supported, with new development contributing to the network of such infrastructure by improving existing and/or providing new areas.

Material Considerations

Wakefield Local Plan 2036 (Examination ongoing)

5.8. The following emerging Local Plan policies are considered relevant:

- **Policy WSP 3: Location of Development** states that development proposals in the Green Belt must conform to Local Plan and national planning policy relating to the Green Belt.

- **Policy WSP 21: Green Belt** details that the general extent of the Green Belt will remain unchanged and amendments to the boundaries will only be undertaken when it will enable development that is consistent with the spatial development strategy.
- **Policy WSP 23: Mitigating and Adapting to Climate Change and Efficient Use of Resources** outlines that to meet the UK 2050 Net Zero Strategy and the Council's declared climate emergency, the development of new renewable energy sources will be encouraged where there is no adverse environmental impact or harm to nearby communities.
- **Policy WLP 33: Assessment of Application for Renewable Energy Generation Developments** states that proposals for low carbon and renewable energy developments will be supported if they do not have an unacceptable impact on factors such as landscape character, local amenity and heritage assets amongst other factors. It goes on to outline that those proposals in the Green Belt will need to conform to national and local policies relating to Green Belt.

National Planning Policy Framework (NPPF) 2021

- 5.9. The NPPF sets out the Government's planning policies for England and how these should be applied and is a material consideration in planning decisions as per Paragraph 2 of the Framework and Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 5.10. Paragraph 11 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and that a presumption in favour of sustainable development is at the heart of the NPPF. For decision taking this means:
- Approving development proposals that accord with the development plan without delay; and
 - Where the development plan is absent, silent or relevant policies are out of date, grant planning permission unless:

- Any adverse impacts of doing so would significant and demonstrably outweigh the benefits, when assessed against the policies in the framework as a whole; or
- Specific policies in the framework indicate development should be restricted.

5.11. Sustainable development is broadly defined in Paragraph 8 of the Framework as having three overarching objectives:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

5.12. Section 13 deals with protecting Green Belt land. It states at paragraph 137 that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green Belt are their openness and their permanence.

5.13. Paragraph 147 and 148 state that;

Inappropriate development is, by definition, harmful to the Green Belt and should only be approved in very special circumstances.

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations.

5.14. Paragraph 151 states that:

When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases development will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

5.15. Section 14 of the NPPF is related to how the planning system can help tackle the challenge of climate change, flooding and coastal change. At Paragraph 151 (c) it is stated that the planning system should facilitate opportunities for the development of renewable and low carbon energy sources.

5.16. 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.

/6 PLANNING POLICY ASSESSMENT

Principle of Development

Climate Change and Low Carbon Development

- 6.1. The UK is a member of the United Nations Framework Convention on Climate Change (UNFCCC). The UNFCCC is the key forum which oversees international action to tackle climate change. The UNFCCC led the development and adoption of The Paris Agreement in 2015. A total of 160 countries have pledged to cut their emissions as part of this process, although more action is needed in order to meet the Paris Agreement's aims of holding the increase in global average temperature rise to well below 2°C above pre-industrial levels and to pursue efforts to limit warming to 1.5°C.
- 6.2. The UK's pledge to reduce its emissions under the Paris Agreement was made as part of a joint pledge by members of the European Union (EU). EU Member States jointly agreed to a 2030 target of at least a 40% reduction in emissions below 1990 levels, supported by an EU-wide climate and energy package. This follows on from the 2020 package which aims to achieve a 20% reduction in emissions relative to 1990, a 20% energy efficiency improvement and a 20% share of renewables in energy consumption by 2020.
- 6.3. Through the 2008 Climate Change Act, the UK was the first country to introduce long-term, legally-binding national legislation to tackle climate change. The Act provides the UK with a legal framework including a 2050 target for emissions reductions, five-yearly 'carbon budgets' (limits on emissions over a set time period which act as stepping stones towards the 2050 target), and the development of a climate change adaptation plan.
- 6.4. According to the Committee on Climate Change, leaving the EU would change how UK carbon budgets are delivered; where policies previously agreed at EU level no longer apply or are weakened, new UK policies will need to replace them. But leaving the EU does not change the need to cut greenhouse gas emissions, the level of carbon budgets

- (which are set in UK law), or the duty on the UK Government to act to tackle climate change.
- 6.5. A review of the UK's 2050 target (previously set at 80% reduction) by the Committee on Climate Change prompted the Government to set a target of zero net emissions by 2050, which was legislated for in 2019. This was followed in December 2020 by the UK Government announcing a new ambitious target to reduce UK emissions by a least 68% by 2030, compared with 1990 levels. Recognising the urgency to go further to tackle climate change, the UK's new target to reduce greenhouse gas emissions – our Nationally Determined Contribution (NDC) under the Paris Climate Agreement – is among the highest in the world and commits the UK to cutting emissions at the fastest rate of any major economy so far.
 - 6.6. The UK's path to meeting this target is backed by the Prime Minister's Ten Point Plan for a green industrial revolution, which will create and support up to 250,000 British jobs by 2030. The plan sets out ambitious policies and investment, with the potential to deliver over £40 billion of private investment by 2030, so that we can develop innovative technologies and make significant strides in cutting emissions across energy, transport and buildings.
 - 6.7. At a national policy level, the NPPF recognises the need to meet the challenge of climate change, as set out in Section 14 of the Framework. Section 6 of the NPPF moreover recognises that radical reductions in greenhouse gas emissions are essential and looks to support renewable energy development where its impacts are, or can be made, acceptable.
 - 6.8. It is therefore clear that there is overwhelming support at a national level for this type of development, and a demonstrable need for the UK to continue to deliver renewable energy projects.
 - 6.9. At a local level, Wakefield Council declared a climate emergency in May 2019, stating that it was feeling the impact of climate change on health, well-being and economy – locally as well as globally. The Council has recognised that carbon emissions are the

main factor driving rising temperatures and have pledged to become a carbon neutral council by 2030 and are aiming to help the entire district achieve the same goal by 2038.

6.10. These are ambitious targets and to help achieve them, the Council adopted a Climate Change Action Plan (CCAP) in September 2020. The CCAP explains the targets, including why they want to achieve them – amongst the justification is that reducing emissions across the borough will aid health and wellbeing, will assist in the green recovery creating new job opportunities, will assist in improving biodiversity across the borough, assist in alleviating fuel poverty and improve air quality.

6.11. In setting out how to achieve these targets, the Council are taking an approach of: Avoid, Reduce, Substitute and Compensate. It is the 'Substitute' step that is the most relevant to the proposed development. Under this heading, the CCAP states that:

Proposals for self-generating and/or buying our own renewable energy through power purchase agreements are currently being considered. This will allow us to displace the emissions associated with the grid mix for the electricity currently supplied to us, which includes power from non-renewable sources. Our 'substitution' work will be crucial as these emissions account for two-thirds of our total baseline.

6.12. Amongst the measures set out to achieve the Council's targets, renewable energy places an important role, and one of the specific projects which the Council is looking at the feasibility to develop energy parks where renewable technology can be used to self-generate clean power to cover the Council's needs. Whilst this project is specific to the Council's own energy use, it suggests support for renewable and low carbon technology, recognising the essential part such technology will play in helping to achieve these targets. It is also pertinent that the wider target of achieving zero carbon across Wakefield by 2038 will need inward investment from parties such as the applicants, bringing this type of low carbon technology to the district.

6.13. In considering the position of the Development Plan, Policy CS 13 deals with mitigating and adapting to climate change and the efficient use of resources. Amongst measures to mitigate the likely effects of climate change is said to be taking measures to reduce

carbon emissions. The policy goes on to state that the Council will encourage the development of new sources of renewable energy where there is no adverse impact on nearby communities.

- 6.14. The emerging Local Plan goes further; Policy WLP 23 takes these requirements further, stating that in order to meet the UK 2050 Net Zero Strategy, and the Council's declared climate emergency, the development of new renewable energy sources will be encouraged where there is no adverse environmental impact or harm to nearby communities. Policy WLP 33 refers specifically to renewable energy generation, stating that proposals for these and local carbon development will be supported if they do not have an unacceptable impact on factors such as landscape character, local amenity and heritage assets.
- 6.15. It is important to note here that as well as being a low carbon technology, battery energy storage systems also assist in the direct exploitation of renewable energy. In planning terms, this was clarified in an appeal decision (ref. APP/R1010/W/17/3172633) for a similar facility in Hilcote, Derbyshire, where the Inspector confirmed that energy storage facilities should fall to be considered under planning policies which deal with renewable energy generation, as a type of development required for the exploitation of renewables:
- 6.16. *"...the appellant indicates that flexible peaking power generation capacity specifically forms part of the renewable energy infrastructure being developed to meet the UK's obligations under the EU Renewable Energy Directive, because renewable sources are supplies that are dependent on the time of day and weather conditions. Moreover, the Council accepts that in so far 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".*

- 6.17. It is clear from the above that the proposed development is compliant with the trust of the Development Plan and emerging policies in proposing a type of development which is low carbon, and which will assist in facilitating the greater deployment of renewable energy. It also has an important role to play in helping the Council achieve its ambitious target for a net zero carbon district by 2038.
- 6.18. The site is located within the Green Belt and a designated Historic Landscape. These issues are addressed in the following section.

Green Belt

- 6.19. Core Strategy Policy CS1 states that development within the Green Belt should conform to national, regional and local policy. The emerging policy WLP 3 has similar requirements. CS 12 allows for development in the Green Belt where there is an overriding need to accommodate what would otherwise be inappropriate development which cannot be met elsewhere and where a Green Belt site offers the most sustainable option.
- 6.20. In considering the requirements of CS 1, and as set out in the preceding section, the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. LPAs should regard the construction of new buildings as inappropriate unless it falls within one of the exceptions set out in NPPF paragraphs 149 and 150. The proposed development does not fall within one of these exceptions and is therefore 'inappropriate' in this sense. Accordingly, very special circumstances are required where the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal must be clearly outweighed by other considerations.
- 6.21. As per *R (Mark Wildie) v Wakefield Metropolitan District Council (2013)*, the correct way to assess whether very special circumstances exist is to first consider the harm by reason of inappropriateness as well as such other further harm to the Green Belt as is identified as being caused by the development, then secondly consider countervailing benefits said to be served by the development; and then consider whether those benefits clearly outweigh the harm so as to amount to very special circumstances:

Harm

6.22. It is acknowledged that there is harm by reason of inappropriateness associated with the Green Belt location of this site, which should be afforded significant weight in the decision-making process.

6.23. With regards to additional harm, it is helpful to consider the purposes for including the site within the Green Belt by looking at the five purposes served by Green Belt as set out in paragraph 138 of the NPPF, and how the site contributes to these purposes:

a) To check the unrestricted sprawl of large built-up areas;

b) To prevent neighbouring towns merging into one another;

c) To assist in safeguarding the countryside from encroachment;

d) To preserve the setting and special character of historic towns; and

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.24. The site is located on the edge of the urban area, with the settlement boundary located to the direct west and north of the site. Whilst the proposed development would result in the extension of an existing built-up area, the scale of the scheme ensures that this would not result in 'unrestricted sprawl'. Nor would the proposed development result in the merging of towns given the location and scale of the proposals. No conflict with purposes (a) and (b) are therefore considered to exist.

6.25. It is acknowledged that there would be some encroachment into the countryside as the result of the scheme. It is however noted that the field in which the site is located is surrounded by other development; with new housing development to the west, the existing large substation to the north, the settlement of Heath to the east. To the south is more open, although several roads do traverse the area to the south of the site. In this sense, the site is fairly contained and doesn't necessarily share 'openness' as a

characteristic as other Green Belt sites in the district might do. Accordingly, whilst a conflict with (c) is identified, this is tempered.

- 6.26. Regarding clause (d), the site is located within a designated historic landscape, and the settlement of Heath, which is a Conservation Area and contains a number of listed buildings, is located to the east. The impacts on heritage will be covered in more detail later in this Section of the Planning Statement, however with specific regard to the setting of the Heath Conservation Area and the Heath Historic Landscape, the Heritage Statement finds that there would be overall low adverse impacts. It is therefore considered that there is a minor conflict with clause (d).
- 6.27. Clause (e) is not considered relevant to this proposal and therefore no conflict is identified.
- 6.28. In terms of the harm to openness as a result of the proposed development, as set out above the site is on the edge of the settlement boundary and is largely surrounded by other existing development. As such, it is not an inherently 'open' site. The location of the site adjacent to the substation and in a part of the wider field which slopes away east to west means that the proposed development is set at a lower level than the surrounds, with its impact mitigated by this and the adjacent building. Whilst the site is currently devoid of development and open in that sense, it is not considered that the site shares the more open characteristics of the Green Belt to the east beyond Heath and to the south of the site.
- 6.29. In terms of the proposed development itself and any resulting loss of openness and visual harm in this sense, it is considered that this has been mitigated as far as possible through sensitive design and the provision of a comprehensive landscaping scheme. This has taken the form of a belt of tree screening around the compound, and wider native tree planting and native woodland mix planting. The site area has been expanded to accommodate this. To the north of the compound, east of the existing substation, additional tree planting has been provided to assist in screening this existing building. The native tree planting in particular would ensure that screening is provided from the outset around the compound, in the wider area, and adjacent to the existing substation.

- 6.30. It was initially proposed that the access track run around the northern edge of the field in which the site is located. This has now been relocated in the southern portion of the field in line with the advice received at the Pre-Application stage. It is considered that this relocation has assisted in lessening the impact of the track. In addition, the track would be surfaced in a natural looking surface material to limit its impact, particularly on openness. It is noted that hedgerow was suggested along the length of the track in the LPA's Pre-Application response, however this has been replaced with more sporadic tree planting so as not to draw attention to the track unnecessarily.
- 6.31. A large swathe of wildflower planting with additional tree planting is proposed to the south of the compound and south of the access track. Further south of this is further native woodland mix and tree planting. This will further assist in softening the appearance of the development as a whole.
- 6.32. Overall it is considered that there would be some inevitable harm to openness as a result of the proposed development, but that this has been limited as far as possible through sensitive design. It should also be noted that in the context of the wider area, the openness of the Green Belt is not perceived to be adversely affected as it is bound by development on all sides – with the substation to the north, housing to the west, travellers camp to the south west, main access into the village to the east and the village itself to the northwest, and the road network to the south.
- 6.33. The above points are reiterated in the Landscape and Visual Impact Assessment, which finds that:

Although the land proposed to be developed is currently without built form, the proposed scheme comprises "development which cannot be met elsewhere and where Green Belt land offers the most sustainable location" as stated within Policy CS 12 – Green Belt. This, in combination with the assessed visual effects and the generally contained nature of the scheme results in limited assessed impacts on openness in the Green Belt. At the assessment site level, the development of the site would see a direct and permanent alteration to the Green Belt designation through the removal of a portion of the existing

arable field parcel and the creation of increased built development and new native planting within the site. Development of the site would be in keeping with local land uses and would relate well to the existing settlement form to the west. The assessment site is well-contained and does not form an integral part of the wider swathe of the Green Belt.”

- 6.34. In terms of other harms, the respective assessments presented with this application consider landscape and visual impact and impacts on the historic environment.
- 6.35. The Landscape and Visual Impact Assessment finds that the majority of landscape and visual effects are minor or negligible. Moderate impacts are expected in terms of the existing land use of the site and in viewpoints in close proximity to the site, particularly from the Trans-Pennine Trail where impacts are small and localised given the scale of the proposed development. Moderate/minor impacts are anticipated on the Heath Historic Landscape and the Green Belt designation as referred to above. Moderate beneficial and minor beneficial impacts are expected respectively on on-site vegetation given the comprehensive landscaping scheme being proposed, and regarding the proposed SuDS pond.
- 6.36. It is noted that in the Pre-Application response the LPA suggested that a more permeable, less industrial type of fencing (such as welded mesh) be used as this was considered more sensitive than the proposed palisade fence. Unfortunately, due to security requirements and insurances, a robust palisade fence is required. However, it is proposed that the fence be provided in green to limit its visual impact, and it is also noted that the entirety of the fencing, which sits only around the compound, is surrounded by heavy standard native tree planting from the outset, thus limiting views of the fence significantly.
- 6.37. The Heritage Statement (HS) finds that there is the potential for three designated heritage assets to be impacted by the proposals; the Heath Historic Landscape, the Heath Conservation Area and the Grade II* listed Dame Mary Bolle’s Water Tower.

- 6.38. The HS explains that this designation covers an area that includes the conservation area, Heath Common and fields to the north and south of the village of Heath which provide a rural setting to the conservation area. The HS finds that the site is located within a modern arable field in open agricultural land bordered to the west by the Wakefield B electricity distribution substation. The HS finds that this field has lost much of its historic character through 20th century field boundary loss, whilst evidence of a former parkland character indicated by 19th century mapping is not longer evident. Accordingly, it is concluded that this particular part of the Heath Historic Landscape retains little authenticity and the proposed development is assessed as having a low adverse effect on the integrity of the historic landscape and a low adverse effect on its cultural significance.
- 6.39. The HS states that the modern agricultural farmland that the site is located in forms part of the rural landscape setting of the Heath Conservation Area, although at some distance from and standing separate from this designation. It is not anticipated that the character of the conservation area, which is inward facing, and focused on its village greens, would be adversely affected by the proposals, and it would not affect the setting of the listed buildings located within the conservation area. Overall, a low adverse effect on the cultural significance of the Heath Conservation Area is predicted.
- 6.40. The Grade II* listed Dame Mary Bolle's Water Tower is located 150m north of the proposed development, adjacent to the northern edge of the proposed landscape planting. The HS finds that there is likely to be some obstruction of views from and towards the tower from/to the south, although views will remain open from Heath to the northeast and Heath Common to the east, ensuring the relationship with the Heath Conservation Area, Heath Common and Heath Old Hall are not adversely affected. The HS considers that the water will remain a visible landmark. Accordingly, a low adverse effect on its cultural significance is anticipated.
- 6.41. As assessment against the relevant local and national policies relating to heritage will be provided later in this section of the Planning Statement.
- 6.42. In conclusion, it is acknowledged that in addition to the harm by reason of inappropriateness, other harms ensuing from the proposed development are some minor conflicts

with the purposes of including the site within the Green Belt, some moderate landscape and visual impacts and some low adverse impacts on three designated heritage assets.

- 6.43. Weighed against this harm are the 'other considerations' including the benefits of the proposed development which are set out below:

Other Considerations and Benefits

Environmental Benefits

- 6.44. Section 14 of the NPPF deals with climate change and states that the planning system should help to support the transition to a low carbon economy. This includes through supporting renewable and low carbon energy and associated infrastructure.
- 6.45. The proposed development will take up energy at times of low demand, store this energy, and release it back to the grid at times of higher demand. It is proposed that the energy storage facility will draw energy from renewable sources only (secured through a power-purchase agreement with a renewable energy provider). Accordingly, the proposals would constitute a type of development required for the exploitation of renewable energy as set out earlier in this statement. This type of scheme is therefore a vital component in the drive towards zero carbon – something which has been recognised by the UK Government as set out in the opening of this Section of the Planning Statement. This type of technology has an important role to play across the National Grid, and at a local level in Wakefield's own target to achieve zero carbon by 2038.
- 6.46. The proposals are an inherently 'low carbon' type of development. The storage of energy, reduces losses and in addition to providing energy security (covered below), reduces the amount of energy that needs to be produced, not just from renewable sources, but from non-renewable sources such as coal and gas. The carbon savings and associated wider environmental benefits of the proposed development should therefore be afforded significant weight in the determination of this planning application. It is noted that at paragraph 151 of the NPPF, it is said that very special circumstances may include the wider environmental benefits associated with the increased production from renewable sources.

Biodiversity Net Gain and Ecological Enhancements.

- 6.47. The proposed development includes a comprehensive landscaping scheme which will result in a significant uplift in biodiversity, with an overall net gain of 141.34%. Although not yet enshrined planning policy, the Environmental Act 2021 requires a mandatory 10% net gain and this will be a requirement on all proposals in the future. Evidently, the uplift here is significantly greater than that requirement.
- 6.48. Enhancements include the creation of approximately 3.4ha of species rich scrub, and approximately 1ha of species-diverse grassland. It is considered that a significant benefit to wildlife will be achieved through the addition of this planting and that of native trees and mixed woodland species, which will also create and enhance potentially important wildlife corridors within and around the site, improving functionality for various species.

Screening of Electricity Distribution building

- 6.49. In addition to providing significant biodiversity net gain and enhancement, the landscape scheme would result in a beneficial landscape and visual impact with regards to the adjacent electricity distribution site located to the north/west of the site. The site area has been expanded to allow for a mix of native woodland mix planting and native tree planting to the immediate east of the existing infrastructure, thus assisting in screening this site in views from the east, including in any limited views from the Conservation Area. Overall, the LVA finds that moderate beneficial impacts would result in terms of the vegetation proposed on site, compared with existing.

Security of Energy Supply

- 6.50. One major drawback of renewable projects has been that the energy they produce is largely dependent on conditions on site beyond the control of the developer (i.e. wind speed, light, etc.). The proposed energy storage facility will assist by providing energy balancing services, in addition to ensuring that energy is not simply lost when demand is low. As the UK transitions to greener energy production, energy storage is vital to ensure that energy is available as and when needed. Without this type of facility on our

National Grid, the UK will need to continue to produce energy via more 'reliable' means involving non-renewable resources.

- 6.51. This type of facility also has the capability to reduce the UK's reliance on foreign imports of energy, including gas, helping to secure our own energy supply. At the time of writing, with rising energy bills at the forefront, this type of scheme is essential.

Need and Locational Constraints

- 6.52. In the Pre-Application response, it was suggested that information be provided that demonstrates that the energy storage capacity which would be provided by the proposed development is needed (giving consideration to the energy storage capacity which has already been developed and additional capacity which is already in the pipeline) and that the proposed development is consistent with relevant strategies and objectives to provide specific quantum of energy storage capacity on the Grid within specific areas by specific dates.
- 6.53. Taking the first point, the amount of energy storage capacity in the pipeline is something of a moving feast as new battery storage systems are submitted to planning and for grid connection and as these are subsequently approved.
- 6.54. With regards to the amount of capacity 'needed', this is much more difficult to answer, if indeed a definitive answer exists. Clearly there is an urgent need to decarbonise our energy supply, recognised nationally and by Wakefield Council, and technology such as this plays an important role. The applicants have secured a connection to the Grid for the 99.9MW capacity proposed by this development, which would not have been granted by Northern Powergrid (the district network operator who are responsible for the grid and energy supply in this area) were it not needed. Such connections are being granted across the UK as there is very much an urgent need for this type of scheme, and we are a long way off reaching a point where more energy storage is not required. It is also noteworthy that at paragraph 158 of the NPPF, it is stated 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.”

6.55. In awarding funding to various energy storage projects in February 2022, Energy and Climate Change Minister Greg Hands said:

"Driving forward energy storage technologies will be vital in our transition towards cheap, clean and secure renewable energy.

It will allow us to extract the full benefit from our home-grown renewable energy sources, drive down costs and end our reliance on volatile and expensive fossil fuels. Through this competition we are making sure the country's most innovative scientists and thinkers have our backing to make this ambition a reality".¹

6.56. With regards to the proposed development being consistent with relevant strategies and objectives to provide specific amounts of energy storage capacity on the Grid within specific areas by specific dates, there are no specific requirements by area as the Grid is interconnected – although this does not mean that BESS can be accommodated anywhere on the Grid as set out above.

6.57. The Pre-Application response goes on to state that evidence should be provided that consideration has been given to other (less sensitive) locations to deliver the proposed capacity, and that these are a clear, valid and robust set of reasons which mean the development has to take place at this site rather than a less sensitive site elsewhere. It was suggested that consideration be given to potentially more suitable available alternative sites within a viable proximity of other suitable substations, including explaining why the proposal could not be accommodated on the vacant land adjacent to the Wakefield B substation.

¹ <https://www.gov.uk/government/news/government-boost-for-new-renewable-energy-storage-technologies>

- 6.58. Taking the first point, there are a number of locational constraints associated with the deployment of energy storage facilities. In order for an energy storage connection to be viable, the point of connection must meet the following criteria:
- It must be located on a part of the electricity network that has available capacity;
 - It must be located at a strategic substation; and
 - It must be located at a substation with available demand capacity.
- 6.59. Such criteria are not commonplace. The above criteria are however all met at the point of connection for the proposed development, the Wakefield B electricity distribution substation to the immediate north of the site. In addition, there is a willing landowner, who supports the scheme.
- 6.60. The site of the energy storage facility itself must be in close proximity to the point of connection, since locations which are distant from the connection point are unlikely to be viable due to the additional infrastructure costs of laying cables, and since system losses over longer distances would render a connection that is further away unviable.
- 6.61. In addition to obtaining planning consent, a viable connection to the grid must also be obtained. Grid connection for battery storage is a highly specialised requirement given the need to both import and export energy from and to the grid as required. Viable grid connections are therefore not commonplace. At this site, a grid connection is available and is viable, provided the energy storage equipment is located in close proximity, as is proposed here. In addition, there is a willing landowner who is keen to see this development come forward.
- 6.62. Notwithstanding the above, a project of this size could not connect elsewhere on the local network as it would be outside of the equipment ratings/parameters and would not be technically feasible. BESS projects of this size generally can only connect into the 132kV network, which in this vicinity is at Wakefield B.

- 6.63. In terms of less sensitive sites in the vicinity of the connection point at Wakefield B, BESS projects are developed subsidy free and the investment case has to meet strict criteria to be fundable. One of the criteria is grid connection and being in proximity to equipment that is capable of accommodating the scale of the project. Proximity can vary between connection points, however generally the closer the site is to the connection point, the better from a technical and financial point of view. At this particular site, the entire area in the vicinity of the point of connection is either Green Belt, or already developed land, with no undeveloped land outside of the Green Belt capable of accommodating the size of project proposed.
- 6.64. Finally, the development cannot be sited within the adjacent Norther Powergrid compound (electricity distribution site) as the land in question is not available and will not be made available to third parties. NPg consider this operational land and the space only exists due to the older outdoor equipment being removed in favour of indoor equipment. NPg would not want to dispose or lease the available land as it is strategically important, as future upgrades to the electricity network here might require the use of that land and as a DNO they responsibilities to protect the future energy scenarios whatever they may be.

Balance

- 6.65. In order for very special circumstances to exist, the harm by reason of inappropriateness and any other harm must be clearly outweighed by other circumstances as required by paragraph 148 of the NPPF.
- 6.66. As set out above, the harm by reason of inappropriateness is only marginally increased by other harm relating to some minor conflicts with the purposes of including the site within the Green Belt, some moderate landscape and visual impacts and some low adverse impacts on three designated heritage assets. Weighed against this are the benefits of the scheme and other considerations:

- Environmental benefits associated with this low carbon technology, which will help to allow the deployment of more renewable energy at a time when Wakefield Council has declared a climate emergency and climate change should be at the forefront of policy and decision-making;
- The contribution made by the proposals to the security of our energy supply;
- The significant ecological and biodiversity enhancements associated with the development, including an overall net gain of 141.34%;
- Comprehensive landscaping scheme which has a beneficial impact in terms of vegetation cover, which assists in screening the existing infrastructure at the neighbouring Wakefield B electricity distribution site;
- The urgent need for battery energy storage technology across the Grid; and
- The locational constraints associated with this type of technology, which mean that points of connection are a rarity.

6.67. It is considered that the benefits and other considerations listed above should be afforded significant weight and that these factors clearly outweigh the harm associated with this development, such that very special circumstances exist.

Summary on Principle of Development

- 6.68. There is overwhelming support at a local and national level for renewable and low carbon technologies. In declaring a climate emergency, Wakefield Council have recognised the urgent need to address carbon emissions and support schemes which can facilitate this. It is therefore considered that the proposed development is wholly in accordance with national and local policy in this respect.
- 6.69. Core Strategy Policy CS1 states that development within the Green Belt should conform to national, regional and local policy. The emerging policy WLP 3 has similar requirements. CS 12 allows for development in the Green Belt where there is an overriding

need to accommodate what would otherwise be inappropriate development which cannot be met elsewhere and where a Green Belt site offers the most sustainable option.

- 6.70. The above has demonstrated that very special circumstances exist and as such national and local Green Belt policy is adhered to. It is also considered that the emerging policy is complied with since there is an overriding need for this type of technology wherever it can be accommodated if the effects of climate change are to be reversed, or at the very least slowed, and that the location proposed is the most sustainable option.

Technical Considerations

Landscape Character and Visual Amenity

- 6.71. Policy D8 requires that development must contribute towards the protection, maintenance and enhancement of the character of the district's landscapes, whilst D12, which deals with landscape design, requires that the new development be designed so that important landscape features are incorporated into the design.
- 6.72. It is acknowledged that there will be some moderate adverse effects on landscape and visual receptors as a result of the proposals, mainly involving the site itself and close-range views. However, it is also the case that the comprehensive landscape scheme will result in material benefits given the amount of tree planting and other planting across the wider site, bearing in mind that the site has been made much larger to accommodate this.
- 6.73. Overall, the proposed development is considered to comply with local and national policy with regards to landscape and visual matters, and certainly the proposed development has been designed to ensure that it has minimal impacts in this respect.

Flood Risk

- 6.74. The proposed development is sited in Flood Zone 1 in line with policy D24 and the NPPF which directs new development towards areas with the lowest risk of flooding. The drainage strategy for the development is considered suitable for this site, ensuring that

the development would not increase the risk of flooding, and utilises sustainable drainage techniques in line with policy D25.

Highways

- 6.75. In line with policy D14, the submitted Transport Assessment demonstrates that the site can be accessed conveniently and safely. Trip numbers associated with the operation of the site are low, and those generated during the construction period will be managed to ensure there are no adverse impacts on the local and wider highways network.

Heritage

- 6.76. A heritage report has been provided which demonstrates that the proposed development has the potential to result in low adverse impacts on three heritage assets; Historic Heath Landscape, the Heath Conservation Area and the Grade II* listed Dame Mary Bolle's Water Tower, resulting in 'less than substantial harm' in NPPF terms.
- 6.77. Accordingly, there is a minor conflict with policy D18 which states that there should be no impact on historic landscapes or conservation areas as a result of the development.
- 6.78. The NPPF states at paragraph 202 that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. This balance will be undertaken in the Planning Balance section at the end of this Section of the Planning Statement.

Ecology

- 6.79. An ecology assessment has been provided as outlined in Section 4. The assessment has demonstrated that there would be no unacceptable ecological impacts as a result of the proposed development, whilst the landscape planting proposals would provide habitat and biodiversity enhancements which are considered a significant material benefit of the scheme, with a biodiversity net gain of 141.34% expected. These measures would

also have a beneficial impact on the Wildlife Habitat Network in which the site is located. Accordingly, impacts would be acceptable in line with policy D6.

Trees and Woodland

- 6.80. The development would result in the loss of one tree and one group of trees, of category B. Pruning of an additional tree is also required at the site entrance. These losses would be adequately compensated for by the significant amount of new tree planting proposed around the site, in accordance with policy D7.

Contaminated Land

- 6.81. Policy D22 deals with contaminated land. In this instance, a Phase 1 geo-environmental assessment has been undertaken which shows there are low risks associated with the development, in line with the requirements of this policy.

Residential Amenity

- 6.82. A noise assessment has been provided which demonstrates that noise levels at the closest sensitive receptors would be within acceptable limits, with mitigation in the form of an acoustic fence installed along the western boundary of the compound. As such, the proposals are considered to comply with policy D22 in this respect. There would be no other forms of emissions associated with the development.

PLANNING BALANCE

- 6.83. In principle, there is clearly support for renewable energy and development that moves us towards a low carbon future at a national and local level, provided the impacts of any such development can be made acceptable.
- 6.84. As set out previously, the proposals are in complete accordance with local and national planning policy on climate change and low carbon development. As the site is in the Green Belt, there is a need to demonstrate that very special circumstances exist. In this instance, it is considered that the harm by reason of inappropriateness and any other

harm is significantly outweighed by the benefits and other considerations associated with the development, such that very special circumstances exist.

- 6.85. It has been identified that there would be some moderate adverse landscape and visual impacts, and less than substantial harm to designation heritage assets given that low adverse effects have been identified on the grade II* listed Dame Mary Bolles Water Tower and the Heath Conservation Area. The same has been predicted with regards to Heath Historic Landscape which is a locally designated heritage asset.
- 6.86. The public benefits of the proposed development are considered significant in this instance, involving the environmental benefits associated with this type of low carbon technology, the benefits to energy security, and the substantial increases in biodiversity net gain. Additionally, the screening provided by the comprehensive landscape scheme would result in a visual improvement in terms of views of the existing electricity distribution site adjacent. It is considered that these benefits sufficiently outweigh the less than substantial harm to the identified heritage assets, and the moderate adverse impacts in term of landscape and visual, which are experienced in close proximity to the site.
- 6.87. The proposed development would not have an adverse impact on ecology, the local highway, local and residential amenity, flood risk or drainage, and there are no other pollution concerns. There would be a significant uplift in biodiversity net gain across the site, with an overall net gain of 141.34% expected. This is an important material benefit weighing in favour of the proposed development.
- 6.88. Overall, it is considered that very special circumstances exist to allow this development to take place in the Green Belt. All other impacts are, or can be made, acceptable, and where there are minor conflicts with policy, it is considered that the benefits of the scheme overwhelmingly outweigh these conflicts.

/7 CONCLUSIONS

- 7.1. PWA Planning has been retained by Harmony Energy Ltd to submit a planning application for the development of an energy storage facility on land at Neil Fox Way, Wakefield.

- 7.2. The principle of the development is considered acceptable in line with local and national policy, where very special circumstances are considered to exist. Any minor conflicts with policy that have been identified and are considered to be outweighed by the numerous benefits of the development, including that the scheme is in accordance with the UK Government's aim to move towards a low carbon economy and reduce greenhouse gas emissions in line with their legally binding targets, and with Wakefield Council's own declaration of a climate emergency. A significant biodiversity net gain would be achieved across the site of 141.34%. This is a key material benefit of the proposal.

- 7.3. The proposed development represents sustainable development which accords with the Development Plan, or where there are conflicts, these are outweighed by other material considerations. There are no other technical reasons which suggest planning permission should not be granted. As such, the proposals should be approved without delay.

Appendix A – LPA Pre-Application Response



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