

DWD

Proposed Battery Energy Storage System on land at Discovery Park

Planning, Design and Access Statement

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1.0 INTRODUCTION

Overview

- 1.1 This Planning, Design and Access Statement ('PDAS') has been prepared in support of a full planning application submitted to Dover District Council ('DDC') (the 'Council') under the provisions of the Town and Country Planning Act 1990 (as amended) ('TCPA') on behalf of Kent Renewable Energy Limited (the 'Applicant').
- 1.2 This planning application seeks full planning permission for the *'Installation of a Battery Energy Storage System (BESS) and associated infrastructure'* at Discovery Park, Sandwich, Kent (the 'Site').
- 1.3 The Site measures 0.88 hectares ('ha') (which is inclusive of an access to a public highway), though the 'Proposed Development Area' (where infrastructure or works are proposed) is significantly less at 0.58 ha. The Proposed BESS would connect into and draw power from the adjacent Kent Renewable Energy ('KRE') Biomass Plant located to the south west of the Site. It is estimated that the BESS would have a total export capacity of 10 megawatts ('MW'). The Proposed Development would have an operational lifespan of approximately 40 years, before the Site is restored back to its former state.
- 1.4 The Proposed Development would provide further stability to the grid through the storage of electricity and the appropriate coordination and release of stored electricity when demand is high or otherwise required. As such, with the existing constraints of grid capacity in the UK, the consenting of BESS and other energy storage technology will be required to support the Country's transition into a Net Zero economy by 2050.
- 1.5 The planning application uses the "Rochdale Envelope" principles. The Rochdale Envelope is widely accepted on energy and infrastructure proposals under TCPA and there is guidance on the use of the Rochdale Envelope by the Planning Inspectorate and EN-1 Overarching National Policy Statement for Energy. Essentially, the Rochdale Envelope requires an assessment to be based on a cautious 'worst case' approach. In this case, what is proposed on site is the maximum that would be built, but it could be less than this or configured in a slightly different way in terms of layout. The Rochdale Envelope provides flexibility in design options where details of the whole project are not available, while ensuring the impacts of the final development are fully assessed.
- 1.6 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050, and recently committed to a net zero electricity system much earlier than this (2035). This requires major investment in proven technologies, such as renewable energy and battery storage,

which is supported by planning policy at both a local and national level. Battery storage proposals, such as the Proposed Development, help to support the development of renewable energy, which is intermittent by its nature, taking energy from the grid at times of higher supply/lower demand and feeding it back at times of lower supply/higher demand.

The Applicant

- 1.7 The applicant is Kent Renewable Energy Limited who own and operate the adjacent Biomass Plant on the Site and are a subsidiary of Copenhagen Infrastructure Partners.

Pre-application Consultation

- 1.8 A request for pre-application advice was submitted to DDC on 21 November 2023. The pre-application advice has not been received at the time of submission of this planning application.

Environmental Impact Assessment

- 1.9 An EIA Screening Request (ref: 23/01124) was submitted to DDC on 9 October 2023. The EIA Screening Opinion issued by DDC on 25 October 2023 confirms that the Proposed Development is not anticipated to give rise to significant environmental impact, and therefore, in accordance with Regulation 5(5) of the 2017 Regulations, an Environmental Statement is not required for the planning application.

Planning Application Submission

- 1.10 The following documents have been submitted in support of this application:

- Covering Letter;
- Planning, Design and Access Statement (this document);
- Drawings:
 - KRE BESS – Site Location Plan - ref: 18189_LAY_1002 Rev C)
 - KRE BESS – Indicative Layout Plan (ref: 18189_LAY_1001 Rev D)
 - KRE BESS – Indicative Container Plan (ref. KREL-ELEV-01)
 - KRE BESS – Lease Area Plan (ref. 18189_LAY_1001 Rev A)
- Biodiversity Net Gain Report;
- Flood Risk Assessment;
- Ecology Phase 1 Walkover Report; and,
- Outline Battery Fire Safety Management Plan.

- 1.11 The application has been submitted electronically via the Planning Portal (ref: PP-12690340) and the requisite application fee has been paid to DDC.

The Purpose and Structure of this Document

1.12 The primary purpose of this Planning Statement is to demonstrate how the Proposed Development is suitable for the Proposed Development Site and its setting; to identify the context and need for the Proposed Development; and to demonstrate the extent to which the proposed development is compliant with the statutory Development Plan and acceptable in relation to the decision-making criteria applicable under the TCPA.

1.13 In doing so, this Planning Statement draws upon and cross-refers to the range of documents and plans that form part of the submission referred to above.

Structure

1.14 The remainder of this document is structured as follows:

Table 1-1: Structure of this document

SECTION	TITLE	OVERVIEW
Section 2	The Site and Surrounding Area	Describes the Proposed Development Site and its key features, the planning history of relevance, and any relevant planning designations.
Section 3	The Proposed Development	Provides an overview of the need for this type of development, and a description of the Proposed Development, including use, amount, layout, appearance and access.
Section 4	Identified need	Outlines the many uses of battery storage within the electricity system, the current and future need for it, and its vital role in delivering a highly renewable electricity system.
Section 5	Planning Policy Context	Sets out the relevant legislative and policy framework for the determination of the planning application.
Section 6	Assessment of the Proposed Development	Provides an assessment of the Proposed Development against relevant policy at national and local levels.

Section 7	Summary and Conclusions	Sets out the conclusions of this Planning Statement in terms of the overall acceptability of the Proposed Development.
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2.0 THE SITE AND SURROUNDING AREA

2.1 This section describes the location and key features of the Site and surrounding area and identifies any relevant planning and environmental designations.

Location, Description and Use

2.2 The Proposed Development Area comprises a 0.58 ha parcel of brownfield land located on the north eastern side of the Discovery Park complex at Great Stonar, approximately 2km north of Sandwich, Kent.

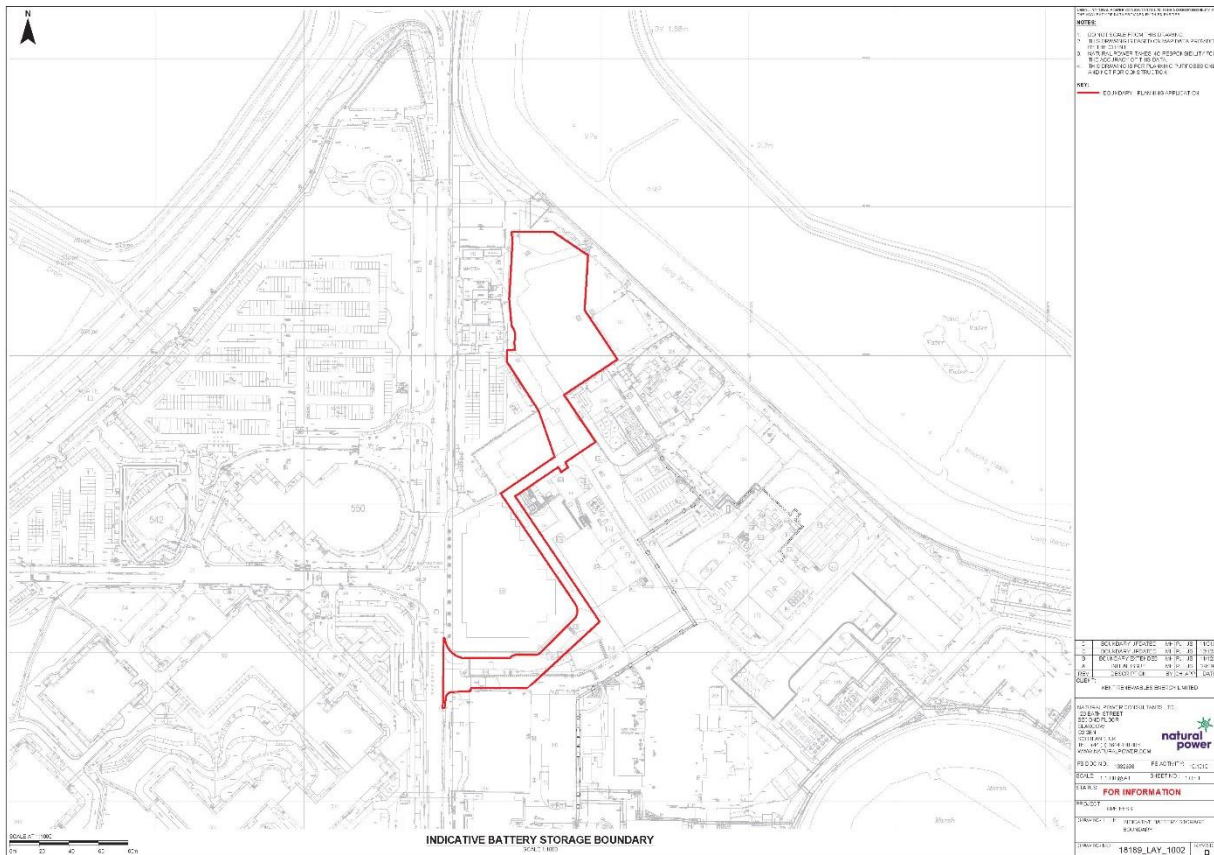
2.3 The Proposed Development Area is accessed via existing private roads off Ramsgate Road (see Figure 2-1 overleaf). The private roads leading from Ramsgate Road to the Proposed Development Area are part of the KRE Biomass Plant secured site, and require entry to be granted by a security gatehouse.

2.4 It is estimated that the BESS would have a total export capacity of 10 megawatts ('MW'). The Proposed Development would have an operational lifespan of approximately 40 years, before the Site is restored back to its former state.

2.5 The Proposed Development would provide further stability to the grid through the storage of electricity and the appropriate coordination and release of stored electricity when demand is high or otherwise required. As such, with the existing constraints of grid capacity in the UK, the consenting of BESS and other energy storage technology will be required to support the Country's transition into a Net Zero economy by 2050.

2.6 The location and extent of the Proposed Development Site is shown on Figure 2-1 below and on the Site Location Plan submitted in support of this application.

Figure 2-1: Extract from the Site Boundary Plan (Ref: 18189_LAY_1002 Rev D)



2.7 The immediate surrounding land uses to the Proposed Development Site comprise:

- To the north east of the Site (beyond the adjacent Wharf Road) is the River Stour and associated wetlands. Areas to the south and west of the Site are largely comprised of industrial development and internal roads associated with Discovery Park. There are further industrial influences, such as warehouses, car storage sites and electrical infrastructure on either side of the A256 corridor which continues to Port Richborough to the north of the Site. The surrounding areas are a mix of agricultural fields, scattered farms and solar farms. The nearest residential properties are approximately 1.3km to the south of the Site in Sandwich.
- The Site is located adjacent to the KRE Biomass Plant which is operated by the Applicant and currently provides Discovery Park with heat and electricity. The surrounding land uses include further wood storage areas and chipper facilities associated with the KRE Biomass Plant. Further warehouses and office buildings are located on the western side of Ramsgate Road towards the centre of Discovery Park.

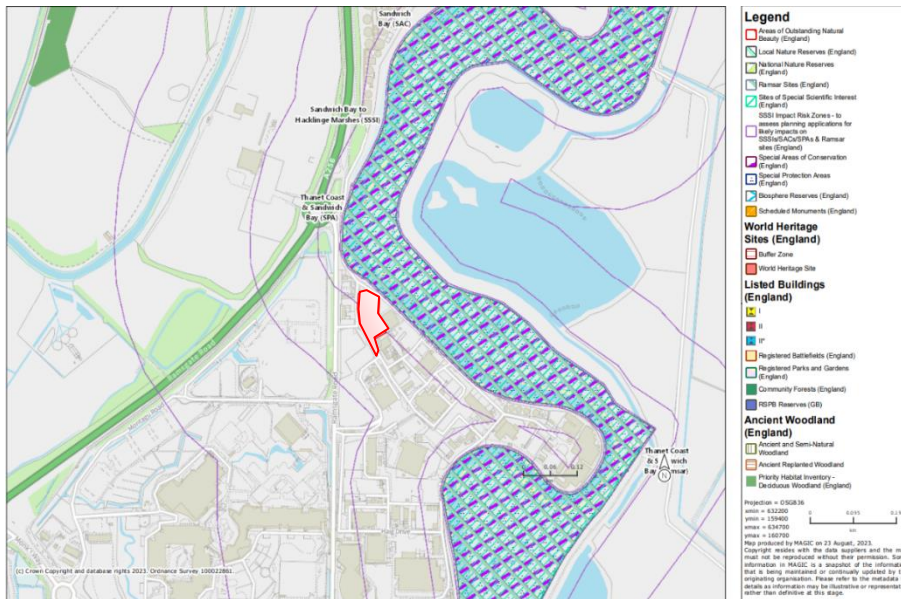
- The immediate roads around the Site and KRE Biomass Plant are secured via a gatehouse access off Ramsgate Road and are not accessible to non-site personnel. According to Kent County Council online records, the closest Public Right of Way ('PRoW') is located approximately 50m west of the Site, comprising a section of the English Coastal Path which also forms part of Ramsgate Road.

2.8 Since 2014 the Site has been used for storage of logs for the adjacent biomass plant (along several other nearby plots within the estate), the Site has since been cleared of any logs. The Applicant intends to continue such storage activity on the other consented log storage areas around the KREL biomass plant, including progressing a separate planning application for a further storage area on a vacant piece of adjacent land west of the Site.

Planning, Heritage and Environmental Designations

- 2.9 A review of the adopted DDC Policies Map, which consists of the Core Strategy (2010), Land Allocations Local Plan (2015) and Saved Policies of Local Plan (2002), confirms that there are no adopted policy designations at the Site. The Site is not located within a conservation area or any of the designated neighbourhood plan areas.
- 2.10 The Site is located in the wider area of Sandwich, which the Core Strategy (2010) identifies as a pharmaceuticals campus with potential for mixed commercial development.
- 2.11 The emerging Policies Map for the Dover District Local Plan (Regulation 19 Submission Version) (2022), depicts the Site as part of an employment site allocation for 'Discovery Park, Ramsgate Road, Sandwich' under site reference 'SAN011b'. This site allocation is detailed further in draft Policy E2 'Loss or Redevelopment of Employment Sites and Premises of the emerging Local Plan' (2022).
- 2.12 The Government's MAGIC mapping software has confirmed that the Site itself is not covered by any adopted planning, heritage or environmental designations. The nearest heritage asset is Richborough Castle, located approximately 1.1km to the west of the Site. The adjacent River Stour and wider area to the east is designated as a Site of Special Scientific Interest (or 'SSSI'). The River Stour is also a designated Ramsar site as well as a Special Area of Conservation ('SAC') and Special Protection Area ('SPA'). The relationship between the Site and these designations is shown in Figure 2-2 on the following page.

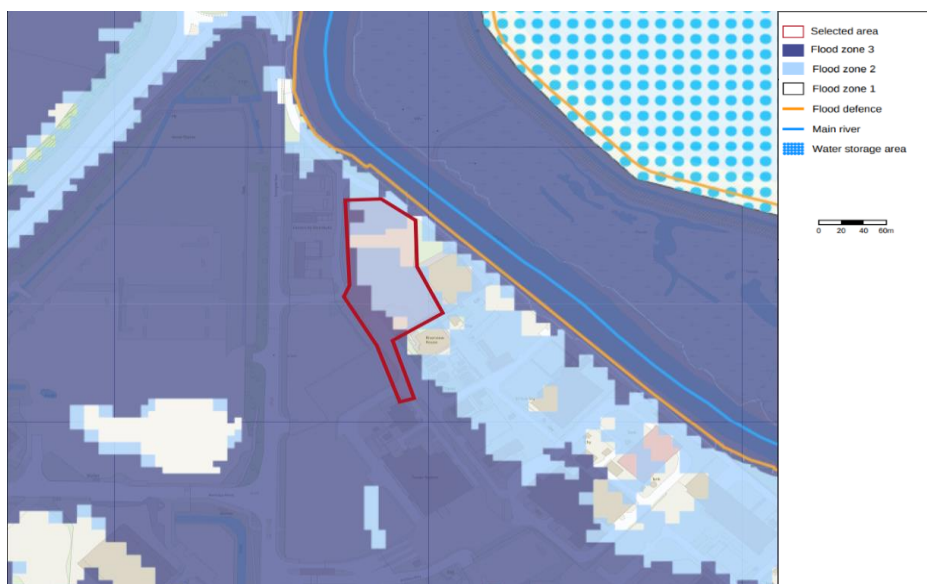
Figure 2-2: Extract from MAGIC Map



2.13 Please note that the plans and drawings used in this section of the report only show the redline boundary for the Proposed Development area, discounting the access road, where no works are proposed.

2.14 As shown in Figure 2-3 below, the Site is located largely within Flood Zone 2, with a small area of Flood Zone 3 present on the west boundary. Flood Zones 2 and 3 are defined by the Environment Agency as areas with higher probability of flooding. As the Site includes areas of both, a Flood Risk Assessment prepared by AECOM has been submitted in support of this application.

Figure 2-3: Flood Risk Map for Planning



3.0 THE PROPOSED DEVELOPMENT

- 3.1 The Proposed Development is for the construction and operation of a BESS with a total export capacity of 10 MW.
- 3.2 The Proposed Development would comprise 8x containerised battery units, 4x inverter/transformer units and 1x switch room/substation set out in uniform rows (the specific configuration will not be known until post consent). The battery units, inverter/transformer units and switch room/substation would be housed in shipping container size units (measuring a maximum of approximately 12.2 metres ('m') (length) x 2.6m (width) and 2.9m (height)). An indicative elevations plan has been submitted to show a typical container unit which would be used to house each element of proposed site infrastructure, including batteries, inverters or substation (Ref. KREL-ELEV-01).
- 3.3 This planning application uses the "Rochdale Envelope" principles. The Rochdale Envelope is widely accepted on energy and infrastructure proposals under TCPA. Essentially, the Rochdale Envelope requires an assessment to be based on a cautious 'worst case' approach. In this case, what is proposed on site (in terms of battery dimensions) is the maximum that would be built, but it could be less than this or configured in a slightly different way in terms of layout (by way of planning condition). The Rochdale Envelope provides flexibility in design options where details of the whole project are not available, while ensuring the impacts of the final development are fully assessed.
- 3.4 An Indicative Layout Plan (Ref: 18189_LAY_1001 Rev D) has been submitted to illustrate a potential configuration of proposed plant at the Site (also shown on the following page). As the submitted site layout is indicative, the final layout and configuration of infrastructure at the Site would be submitted and approved via a suitably worded condition attached to the planning permission (as per the Rochdale Envelope approach set out above). This approach is selected by developers on projects of this nature because typically the technology provider the proposed infrastructure isn't selected until a planning permission is received. Therefore, at the point of submission, the exact layout (and plant dimensions) is not available to the Applicant, but will be submitted for the Council's approval through planning condition once confirmed.
- 3.5 At present, it is assumed that the containers on site would be coloured in a dark grey, in order to appropriately assimilate with the surrounding industrial estate and biomass plant. Exact colours however (including RAL numbers) will be confirmed and approved via a suitably worded condition attached to the planning permission.

- 3.6 To connect the Proposed Development to the KREL Biomass Plant (from which it draws power), an underground electrical cable will be fitted from the onsite switch room/substation cabin. The connection cable will run south for approximately 80m, most likely through existing underground ducts (though new ones will need to be installed should there be insufficient room) from the switch room to the biomass plant. The proposed underground electrical cable is shown by the green line on the submitted indicative Layout Plan (Ref: 18189_LAY_1001 Rev D).
- 3.7 The Proposed Development may also require some upgrades to internal site access tracks and CCTV surveillance, though it should be noted that the Site is already entirely hardstanding and securely fenced.

Figure 3-1: Extract from the Proposed Indicative Layout Plan (Ref: 18189_LAY_1001 Rev D)



4.0 IDENTIFIED NEED

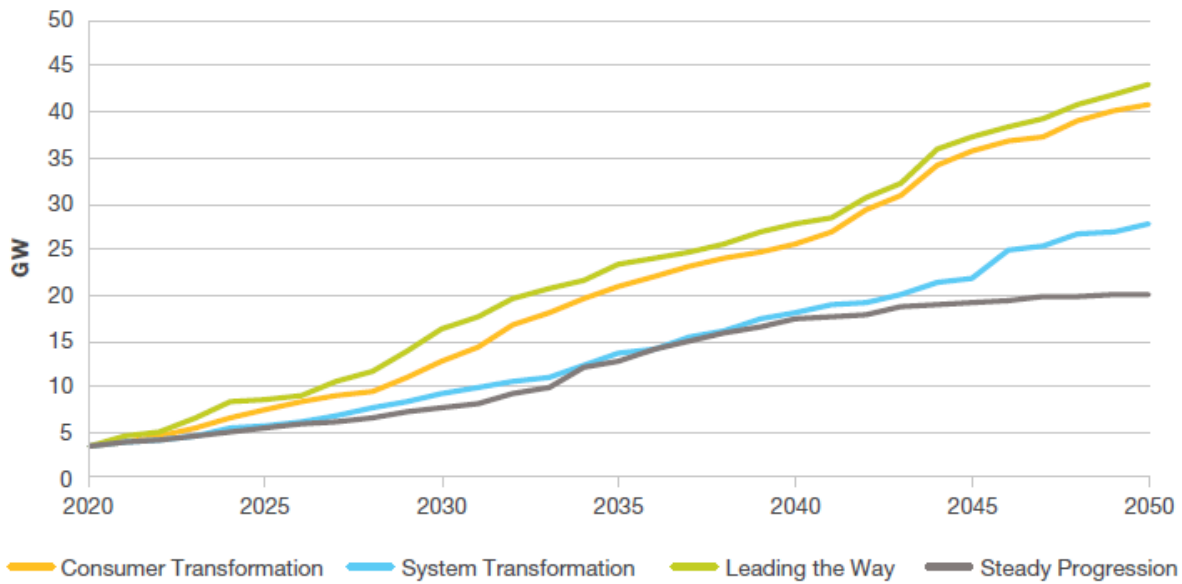
- 4.1 This section of the report outlines the many uses of battery storage within the electricity system, the current and future need for it and how it is vital to support the move to a highly renewable electricity system in order to meet the government’s legal commitment to achieve net zero emissions nationally by 2050.
- 4.2 In October 2021 the UK government announced¹ a commitment to decarbonise the UK’s electricity system by 2035, a full 15 years earlier than the nationwide 2050 legal commitment, identifying that *“we need to reduce our emissions and meet increased demand whilst ensuring the system remains reliable and affordable”*.
- 4.3 The Government also recently published the ‘Net Zero Strategy, Build Back Greener’, which sets out its vision to end our contribution to climate change, and reverse the decline of our natural environment, leading the World to a greener, more sustainable future. It sets out that we need to act urgently and reduce emissions globally to limit further global warming. The sooner we act on climate change the lower the costs will be. Globally, the costs of failing to get climate change under control would far exceed the costs of bringing greenhouse gas emissions down to net zero. Delaying action would only serve to put future generations at risk of crossing critical thresholds resulting in severe and irreversible changes to the planet, the environment, and human society. On the other hand, early and ambitious action would help protect lives and livelihoods, while maximising the benefits for people, society, the environment, and the economy.
- 4.4 This Strategy commits to take action so that by 2035, all electricity will come from low carbon sources, subject to security of supply, bringing forward the Government’s commitment to a fully decarbonised power system by 15 years, and it explicitly seeks to accelerate deployment of low-cost renewable generation, including wind and solar. It also notes that our exposure to volatile gas prices shows the importance of our plan for a strong home-grown renewable power sector to strengthen our energy security into the future.
- 4.5 Meeting these targets requires major investment in proven technologies. The provision of low carbon energy is central to the economic, social and environmental dimensions of sustainable development set out in the National Planning Policy Framework (NPPF). There is strong national

¹ ‘Plans unveiled to decarbonise UK power system by 2035’ (Secretary of State for Business, Energy & Industrial Strategy, 7 October 2021). Available at: <https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035>

policy support, from the Government’s Energy White Paper (EWP) and National Policy Statement (NPS) EN-1, for the development of additional battery capacity, which is essential to the storage of energy generated from renewable sources which by their nature, intermittently generate energy, taking energy from the grid at times of higher supply/lower demand and feeding it back at times of lower supply/higher demand. Additionally, NPS EN-1 advises that storage is needed to reduce the costs of electricity and increase the reliability of supply.

- 4.6 The UK Government published the revised suite of Energy NPSs in November 2023. The NPSs are a material consideration for TCPA and other applications below 50 MW in England.
- 4.7 The draft of NPSs now provide clearer support for electricity storage and guidance on the key considerations to be taken into account in ensuring a more consistent approach across local authorities.
- 4.8 Consistent with the current version, Draft NPS EN-1 emphasises at paragraph 3.3.25 that storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher.
- 4.9 Battery storage has a number of different uses within the electricity system and is going to become an increasingly vital part of our system in the future. In 2020 National Grid ESO published an article titled Electricity Explained: Battery Storage. This states that *“battery storage is a vital tool that we use to balance the grid and they play a wide range of roles in doing so. The main function is to provide us with artificial inertia and it is stored electricity that can be called upon to provide fast response.”*
- 4.10 This is supported by paragraph 3.3.27 in Draft NPS EN-1 which asserts that storage can provide various services, locally and at the national level, including: maximising the usable output from intermittent low carbon generation (e.g. solar and wind); reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the National Electricity Transmission System Operator (‘NETSO’) and Distribution Network Operators (‘DNOs’) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.
- 4.11 National Grid’s Future Energy Scenarios (2021) states that currently the energy storage capacity in the UK is 4GW and by 2050 it is anticipated that 40GW of capacity would be required in order to meet the UK’s target of net zero carbon by 2050, as shown in Figure 4-1. Although the scheme is modest in size, paragraph 158 of the NPPF confirms that even *“...small-scale projects provide a valuable contribution to cutting greenhouse gas emissions”*.

Figure 4-1: Electricity Storage Capacity (Excluding V2G) (from ‘Future Energy Scenarios 2021’ by National Grid ESO)



4.12 The move towards a highly renewable electricity system is already underway. The Climate Change Committee’s 2021 Progress Report to Parliament identifies that between 2009 and 2019 electricity generated from renewables has increased from 9 terawatt hours (TWh) (approximately 3% of total generation) to 73 TWh (approximately 26% of total generation). The report goes on to suggest that 70% of total generation should come from renewables by 2035, and 80% by 2050.

4.13 Taking all of the above into account it is of clear and national importance that energy storage capacity increases to keep up with and facilitate the rapid deployment of renewable energy.

4.14 At a local level, DDC formally declared a Climate Emergency in January 2020. The Climate Change Strategy (2021) released by DDC sets out the Council’s aim to become a net zero carbon emitter by 2030 at the latest. This demonstrates an urgent need for DDC to develop renewable energy infrastructure.

4.15 In light of the above, it is considered that there is a strong national and local need for BESS developments such as the Proposed Development.

5.0 PLANNING POLICY CONTEXT

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

Statutory Development Plan

- 5.4 The Site is located entirely within the DDC area. The following planning policy documents are considered most relevant to the Proposed Development:
- Dover District Council Core Strategy (2010);
 - Policies Maps (derived from the adopted Core Strategy (2010) and Land Allocations Local Plan (2015)); and,
 - Saved Policies of Dover District Local Plan (2002).
- 5.5 The following policies from are considered of most relevance:

The following policies from are considered of most relevance:

[Dover District Council Core Strategy \(2010\)](#)

- Policy CP 1: Settlement Hierarchy
- Policy CP 6: Infrastructure
- Policy CP 7: Green Infrastructure Network

[Dover District Council Core Strategy Annex 1 Development Management Policies \(2010\)](#)

- Policy DM2: Protection of Employment Land and Buildings
- Policy DM16: Landscape Character

Emerging Planning Policy

- 5.6 DDC has been preparing a new Local Plan. The emerging Dover District Local Plan Regulation 19 Submission (2022) was submitted for examination on 31 March 2023. Adoption of the new Local Plan is expected to take place during 2024.
- 5.7 Given the emerging Local Plan is in an advanced stage of preparation, due weight should be given to it when assessing the Proposed Development, in accordance with Paragraph 48 of the NPPF.
- 5.8 The following policies from are considered of most relevance:
- Draft Policy SP1: Planning for Climate Change
 - Draft Policy CC3: Renewable and Low Carbon Energy Development
 - Draft Policy CC5: Flood Risk
 - Draft Policy E2: Loss or Redevelopment of Employment Sites and Premises
 - Draft Policy NE1: Biodiversity Net Gain
 - Draft Policy NE2: Landscape Character and the Kent Downs AONB
 - Draft Policy HE1: Designated and Non-designated Heritage Assets

Other Material Considerations

National Planning Policy

- 5.9 The NPPF was adopted in March 2012 and was most recently updated in December 2023. It sets out the Government’s planning policies for England and how these are to be applied. The policies contained within the NPPF are expanded upon and supported by National Planning Practice Guidance (NPPG), which was first published in March 2014 and has been periodically updated since.
- 5.10 The NPPG sections that are considered most relevant to the Proposed Development include:
- Climate change;
 - Flood risk and coastal change;
 - Historic environment;
 - Natural environment;
 - Open space, sports and recreation facilities, public rights of way and local green space; and,
 - Renewable and low carbon energy; and,
 - Strategic environmental assessment and sustainability appraisal.

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

5.12 The following designated NPSs are relevant:

- Overarching NPS for Energy (EN-1); and
- NPS for Renewable Energy Infrastructure (EN-3).

5.13 The following draft NPSs published in November 2023 and anticipated to be designated early 2024, are also considered to be of relevance:

- Draft Overarching NPS for Energy (EN-1); and
- Draft NPS for Renewable Energy Infrastructure (EN-3).

Other

5.14 In June 2019 the Government raised the UK's ambition on tackling climate change by legislating for a net-zero greenhouse gas emissions target for the whole economy by 2050. In October 2021 the UK government announced a commitment to decarbonise the UK's electricity system by 2035, a full 15 years earlier than the nationwide 2050 legal commitment.

5.15 Decarbonising the power sector is integral to achieving this goal and requires major investment in proven technologies, such as battery storage, which are supported by planning policy at a local and national level – as further detailed at paragraphs 4.5 to 4.13 in section 4.

5.16 In addition, whilst not planning policy documents, the following also form material considerations:

- National Infrastructure Commission – Net Zero: Opportunities for the Power Sector (2020);
- National Infrastructure Commission – Net Zero: Commission Recommendations and the Net Zero Target (2020);
- International Renewable Energy Agency – Battery Storage for Renewables: Market Status and Technology Outlook (2015);
- DDC Climate Change Strategy (2021); and,
- Kent Environment Strategy (2016).

5.17 There are also numerous other documents that are relevant in terms of the need that exists for the Proposed Development and proposals of its kind.

6.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT

6.1 This section of the statement provides an assessment of the Proposed Development, in order to demonstrate how it has taken account of and accords with relevant planning policy. The key assessment topics in this section are as follows:

- Principle of Development;
- Employment
- Landscape
- Biodiversity Net Gain (BNG)
- Flood Risk
- Cultural Heritage

Principle of Development

Policy Summary

6.2 The NPPF (2023) contains explicit support for renewable and low carbon energy in Chapter 14 ‘Meeting the challenge of climate change, flooding and coastal change’. Paragraph 158 states that:

“When determining planning applications for renewable development, local planning authorities should not require applicants to demonstrate need for renewable energy and should approve an application if impacts are (or can be made) acceptable.”

6.3 As mentioned in the Section 4 of this statement, the PPG (updated August 2023) recognises the importance of developing renewable energy infrastructure and supports the use of BESS. The benefits of electricity storage include enabling more flexible and cost-effective energy use.

6.4 Paragraph 2.27 of the Core Strategy (2010) recognises that it is important that acceptable schemes for general renewable energy production are brought forward.

6.5 Draft Policy SP1 ‘Planning for Climate Change’ of the emerging Local Plan (2022) recognises the need to respond to the challenges of the climate emergency and states that the Local Plan supports the delivery of the objectives of the Council’s Climate Change Strategy, in addition to the Kent Environment Strategy and the Kent Energy and Low Emissions Strategy.

6.6 Draft Policy SP1 sets out the Council’s overarching strategy for addressing climate change and delivery a carbon neutral District by 2050, ensuring all new built development contributes to the

mitigation of, and adaption to, climate change, via measures including incorporating renewable and low carbon technologies, and providing opportunities for decentralised energy and heating.

6.7 Draft Policy CC3 ‘*Renewable and Low Carbon Energy Development*’ of the emerging Local Plan (2022) supports the development of schemes that generate renewable and low carbon energy to increase the proportion of renewable and low carbon energy generated in the District. It states:

‘Development to generate energy from renewable and low carbon sources will be supported where it is demonstrated that:

- a) The environmental, social and economic benefits of their proposals are made clear;*
- b) It will not result in significant harm to the surrounding area, landscape character, natural or heritage assets, habitats, biodiversity, or wildlife (particularly protected species), having special regard to the natural beauty of the Kent Downs AONB;*
- c) There is no significant loss of amenity to local residents by virtue of visual impact, noise, disturbance or odour;*
- d) The proposals will conserve and enhance the natural environment through measures such as improvements to biodiversity;*
- e) There is no loss of the best and most versatile agricultural land, unless that it can be demonstrated that no alternative lower grade land is available;*
- f) It will not result in an unacceptable impact on the local transport network that cannot be satisfactorily mitigated;*
- g) Any fuel required is sustainably sourced.*

All applications for renewable and low carbon energy developments should include a supporting statement setting out how the proposals meet the criteria of this policy.’

6.8 The DDC Climate Change Strategy (2021) sets out the aims for DDC to become a net zero carbon emitter by 2030 at the latest. This Strategy also recognises the need to tackle the 2050 target of net zero district-wide through mitigation and the need to adapt to the inevitable changing climate.

6.9 The Kent Environment Strategy (2016) sets out the County’s commitments to carbon reduction and renewable energy generation. This Strategy recognises there is a need and an opportunity to integrate measures that will ensure that infrastructure and asset development will be more sustainable without significant detrimental economic, social and environmental impacts.

Assessment

- 6.10 The Proposed Development comprises a BESS with an export capacity of 10MW. It would provide further stability to the grid through the storage of electricity and the appropriate coordination and release of stored electricity when demand is high or otherwise required. Delivering the Proposed Development would assist in achieving the Government’s objective to move towards the net zero target and also contribute to the District and County’s aim of increasing low carbon and renewable energy locally.
- 6.11 The Proposed Development would enable more flexible energy use and help move towards having a more cost-effective and low carbon energy system, which is supported by the PPG (2023).
- 6.12 As such, it is clear that the principle of development of the proposed BESS is supported by both national and local planning policy.
- 6.13 In terms of impacts to amenity, once operational, the BESS would be relatively inert and would be managed to avoid adverse environmental impacts. Measures would be taken during construction to minimise impacts on the surrounding area, these would be set out through the provision of Construction Environment Management Plan (‘CEMP’), to be secured by planning condition and approved by the LPA prior to the commencement of development.
- 6.14 With regard to noise, there are no residential receptors or Noise Action Plan Important Areas (NAPIAs) located within 1km of the Site. Due to the nature of the Proposed Development, adverse noise and vibration impacts would be largely limited to the construction phase during which there may be some temporary noise and vibration impacts due to construction traffic and construction activities. As stated above, these impacts will be minimised through the implementation of an CEMP and good practice construction methods.
- 6.15 Any operational noise from cooling fans associated with the BESS during operation in warm weather will be relatively minor and indiscernible from the general background noise from the surrounding industrial uses. Given the distance to residential receptors and the industrial nature of the location, it is not expected that the Proposed Development will cause any adverse effects from noise.
- 6.16 An Outline Battery Safety Management Plan (OBSMP) has been produced and submitted as part of the planning application, this document sets out the headline fire safety measures that will be incorporated when locating and operating the BESS. The Applicant is happy to liaise with local Fire and Rescue Service further on the content of the BSMP once the planning application is sent out to formal consultation with stakeholders.

- 6.17 In terms of air quality, there are no residential receptors located within 1km of the Site. The nearest Air Quality Management Area (AQMA), Thanet District Council AQMA is approximately 3.9km northeast of the Site.
- 6.18 Emissions associated with the construction phase would relate to construction vehicles and on-site activities and would not be of a level likely cause adverse impact to environment or residential amenity; the Proposed Development is expected to require in the order of 20 movements and relatively few light vehicles associated with a small number of construction workers, distributed over several days. There is the potential for some construction dust to be generated by on-site activities, however, this would be temporary in nature, minimal due to the small scale activities and absence of demolition or foundation works, and managed through a CEMP (secured via planning condition).
- 6.19 The Proposed Development would not result in any emissions to air during its operation other than those from the few and infrequent vehicles associated with periodic maintenance / inspection visits to the Site. It is anticipated that the Proposed Development will not give rise to adverse air quality effects during construction or operation, and therefore is policy compliant.
- 6.20 In terms of impact to the road network, the Site has good links to the local and national road network, with Wharf Road and Ramsgate Road adjacent to the Site and spurring off the A256.
- 6.21 Traffic impacts would be mainly associated with the temporary construction and decommissioning phases, but with only a relatively small number of vehicle movements; the Proposed Development is expected to require in the order of 20 HGV movements and relatively few light vehicles associated with a small number of construction workers, distributed over several days. The road network is considered to have sufficient capacity to absorb this number of trips, and with sufficient width to accommodate HGVs, and therefore construction traffic associated with the Proposed Development is not likely to result in significant effects.
- 6.22 During the operational phase, vehicle movements are anticipated to be very low and restricted to periodic visits for maintenance and inspections. Such traffic flows would not result in significant traffic effects.
- 6.23 Impacts with regard to landscape, ecology and heritage are set out in the below text.

Employment

Policy Summary

- 6.24 Policy DM2 ‘Protection of Employment Land and Buildings’ of the Core Strategy (2010) states:

‘Land allocated for employment uses as shown on the Proposals Map or with extant planning permission for employment uses will not be granted permission for alternative uses unless it has been subsequently allocated for that alternative use in a Development Plan Document.

Permission for changes of use or redevelopment of land and buildings currently or last in use for employment purposes will only be granted if the land or buildings are no longer viable or appropriate for employment use.’

6.25 Draft Policy E2 ‘Loss or Redevelopment of Employment Sites and Premises’ of the emerging Local Plan (2022) prevents the loss of existing employment sites, which states:

‘Proposals which result in the loss of existing employment sites (as identified on the policies map), or other buildings and land currently used for employment purposes (office (E(g)(i), research and development (E(g)(ii), light industrial (E(g)(ii), B2 and B8 uses) within the District, will only be supported where:

- a. The site is allocated for alternative use within this Plan, or*
- b. The proposal would not result in a significant, or harmful reduction in the supply of land available for employment purposes for the remainder of the plan period, having regard to the type of employment land proposed for reuse and its location; and*
- c. It has been demonstrated that an employment use is no longer suitable or viable.*

The proposed replacement use should be compatible with the uses in the surrounding area and should not prejudice the ongoing operation of existing businesses nearby.’

Assessment

6.26 While the Site is located within the emerging employment site allocation ‘Discovery Park, Ramsgate Road, Sandwich’ under site reference SAN011b, as identified on the emerging Policies Map (2022), it is not an allocated employment site in the adopted Policies Map. As such, Policy DM2 of the Core Strategy (2010) is not of direct relevance to the Proposed Development and that it should not be solely assessed against Policy DM2.

6.27 The Proposed Development would generate a small number of employment opportunities during construction which could benefit the local economy, however, given the relatively small scale of the development these are unlikely to be significant. The Proposed Development will not reduce the supply of employment land in the District, and therefore, it is considered policy compliant.

Landscape

Policy Summary

6.28 Policy DM16 ‘Landscape Character’ of the Core Strategy (2010) states:

‘Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if:

- i. It is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or*
- ii. It can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.’*

6.29 Draft Policy NE2 ‘Landscape Character and the Kent Downs AONB’ of the emerging Local Plan (2022) requires proposals to *‘demonstrate particular regard to the Landscape Character Area, as defined by the Dover District Landscape Character Assessment 2020 and the Kent Downs AONB Landscape Character Assessment Review, in which they are located and in particular to the following landscape characteristics:*

- a. Landform, topography, geology and natural patterns of drainage;*
- b. The pattern and composition of trees and woodlands;*
- c. The type and composition of wildlife habitats;*
- d. The pattern and composition of field boundaries;*
- e. The pattern and distribution of settlements, roads and footpaths;*
- f. The presence and pattern of historic landscape features;*
- g. The setting, scale, layout, design and detailing of vernacular buildings and other traditional man-made features...’*

Assessment

6.30 The Site is not subject to any locally, nationally or internationally important landscape designations. It is not located in any of the Landscape Character Areas (LCAs) within the Kent Downs AONB. The Site is located in ‘Local Character Area B1: Great Stour - Sandwich Corridor’, as identified in the Dover District Landscape Character Assessment (2020).

6.31 There are no hedgerows or trees on or adjacent to the Site. The Site is hardstanding, brownfield land adjacent to Wharf Road (beyond which is the River Stour to the east), which is currently used as a log store for the biomass fuel for Kent Renewable Energy, along with a hard surfaced car park for the relocated log store adjacent to Ramsgate Road. Looking west from Ramsgate Road across the Kent Renewable Energy facility; the log store is visible, with the office building behind (beyond which is the Wharf Road and the river).

- 6.32 While construction equipment and materials associated with the works will be present during construction, these will be on a temporary and short-term basis. It will also be against the backdrop of the industrial park and large existing structures. As such, no significant construction related landscape and visual impacts are anticipated.
- 6.33 During operation, no significant landscape and visual related impacts are predicted due to the relatively small scale of the Proposed Development. The Proposed Development will be in keeping with the existing industrial character of the Site and therefore no impacts are anticipated on the local landscape character. Overall, it is considered that the Proposed Development is policy compliant.

Biodiversity Net Gain (BNG)

Policy Summary

- 6.34 The Core Strategy (2010) sets out the District’s objectives, including *‘mitigate and adapt to the forecast impacts of climate change, in particular on the water environment and biodiversity’*.
- 6.35 Draft Policy NE1 ‘Biodiversity Net Gain’ of the emerging Local Plan (2022) requires development proposals to provide a minimum of 10% biodiversity net gain above the ecological baseline and in accordance with the Biodiversity Net Gain SPD. Draft Policy NE1 states:

‘...Proposals for biodiversity net gain must:

- a. be provided as part of the development, within the development site boundary. Only if it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary will the Council consider off-site alternatives in line with the mitigation hierarchy approach;*
- b. be provided above the agreed pre-development ecological baseline of the site, for both area and linear habitats, and in addition to any loss;*
- c. focus on local priorities and be informed by the Kent Local Nature Recovery Strategy, the Dover District Green Infrastructure Strategy and the Kent Biodiversity Strategy;*
- d. be secured for a minimum of 30 years after completion;*
- e. be informed by a comprehensive understanding of habitats and species associated with the site, to include survey and assessment work carried out by suitably qualified professionals and relevant information from the Kent and Medway Biological Records Centre; and*
- f. follow the mitigation hierarchy and demonstrate by appropriate project design, evidence of adequate avoidance, minimisation and mitigation measures. Where harm to wildlife*

habitats cannot be avoided or adequately mitigated, appropriate compensation measures will be sought as a last resort...”

6.36 Draft Policy NE1 from the Emerging Local Plan (2022) further explains that

6.37 *‘All planning applications must be supported by a Biodiversity Net Gain Plan and supporting reports with information to demonstrate how at least 10% biodiversity net gain will be achieved, including:*

- i. use of the applicable and most up-to-date DEFRA metric calculation, including breakdown of stages;*
- ii. an assessment of the likely effects of the development and changes to the ecological baseline;*
- iii. details of the ecological assessments to include both qualitative and quantitative evidence;*
- iv. details of the design and location of the proposals; and*
- v. details of how the net gain proposals will be implemented, managed and maintained’*

Assessment

6.38 The Site is located on hardstanding and there is no existing vegetation on-site. It is located approximately 20m west of the Sandwich Bay Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and Ramsar Site, separated by Wharf Road. A Biodiversity Net Gain (‘BNG’) Assessment has been submitted with this application which confirms that Site as having zero habitat units as its baseline condition. To be prudent, the Applicant has also submitted a Phase 1 Habitat Survey and Ecological Appraisal Report to identify and map any existing ecological features within the Site and immediate area.

6.39 The Biodiversity Net Gain Assessment for the Proposed Development has been undertaken in advance of the Environment Act 2021 provisions (to make BNG mandatory) coming into force in January 2024. Once adopted early next year, these amendments to the Town and Country Planning Act 1990 will require a minimum 10% biodiversity net gain from relevant developments. The Applicant has taken this into consideration in the recommendations made by the BNG Report, though it should be noted that when considering the baseline habitat conditions of the Site, only a small amount of the BNG enhancement should more than exceed 10% if agreed and undertaken.

6.40 There are no anticipated effects associated with ecology, and if BNG can be achieved, the overall effect would be beneficial. Therefore, the Proposed Development is policy compliant.

Flood Risk

Policy Summary

6.41 Paragraph 2.63 of the Core Strategy (2010) confirms that much of the Sandwich town is ‘at risk of flooding, especially from the sea, and account must be taken of this constraint in determining the location and amount of new development’.

6.42 Draft Policy CC5 ‘Flood Risk’ of the emerging Local Plan (2022) states:

‘Development on sites at risk of flooding must comply with the National Planning Policy Framework and associated guidance and will only be permitted as an exception and where it is demonstrated by a site-specific Flood Risk Assessment (FRA), carried out in accordance with the requirements set out in the Council’s Strategic Flood Risk Assessment, that it would not result in an unacceptable risk of flooding on the site itself or elsewhere.

The FRA should be prepared in accordance with the guidance set out in the Council’s ‘Site-specific Guidance for Managing Flood Risk’. For development identified by the FRA to be at risk of flooding from any source, flood mitigation should be implemented in accordance with the Flood Risk Management hierarchy outlined in the document ‘Site-specific Guidance for Managing Flood Risk’.

Assessment

6.43 The Site is predominantly located within Flood Zone 2 and partially located within Flood Zone 3. The Site is located approximately 20m southwest of the River Stour and benefits from flood defences, which are likely to be adequate to protect the Site (but which are not taken into account by the Environment Agency in mapping Flood Zones 2 and 3).

6.44 Any potential risks associated with construction activities disrupting existing surface water flow pathways and surface water / ground water pollution would be adequately managed through implementation of good industry practices and outlined in an environmental management plan.

6.45 There are no likely significant effects on flood risk, drainage or water resources, but due to the theoretical flood risk mapped by the Environment Agency, a Flood Risk Assessment (FRA) has been carried out by AECOM and submitted in support of the planning application.

6.46 In terms of the flood risks to the Proposed Development, the FRA confirms the following:

- The current and future risk of tidal flooding is considered ‘Very Low’;
- The likelihood of a defence breach is ‘Low’; however the consequences associated with a breach are ‘Very High’. Therefore, the overall risk is considered to be ‘Medium’;

- The risk of fluvial flooding to the Site is ‘Low’;
- The risk of surface water flooding to the Site is deemed ‘Very Low’;
- The risk of ground water flooding to the Site is deemed ‘Low’; and,
- The risk of flooding from artificial sources is considered to be ‘Very Low’.

6.47 In terms of the flood risk from the Proposed Development, the FRA confirms that it is unlikely that there will be an increase surface water runoff as a result of the development, due to no increase in the impermeable area. The FRA also highlights that as the Site is protected by flood defences throughout its lifetime, the Proposed Development will not cause a loss of floodplain storage, and therefore no compensation is required. It proposes that drainage strategies to be developed post-consent.

6.48 As the Proposed Development is considered to be a minor development (i.e. less than 1 Hectare in size), a sequential test has not been provided, as is compliant with national guidance.

6.49 To reduce the consequences of flooding in a breach scenario, mitigations measures are proposed in the FRA, including Flood Resilient Design; Flood Evacuation Route; and Good Practice. For full details, please refer to the FRA.

Cultural Heritage

Policy Summary

6.50 Draft Policy HE1 ‘Designated and Non-designated Heritage Assets’ of the emerging Local Plan (2022) states that *‘proposals which conserve or enhance the heritage assets of the District, sustaining and enhancing their significance and making a positive contribution to local character and distinctiveness will be supported’*. It does not support development where *‘it will cause total loss of significance or substantial harm to a designated heritage asset, unless it can be demonstrated that the harm or loss is necessary to provide substantial public benefits that will outweigh the harm or loss caused...’*

Assessment

6.51 The Site is hardstanding, brownfield land adjacent to Wharf Road (beyond which is the River Stour to the east), currently used as a log store for the biomass fuel for Kent Renewable Energy. It is previously disturbed land and unlikely to host buried archaeology. The Site is not identified as having any archaeological significance and does not contain any listed buildings, Scheduled Monuments, or other designations/assets. There is a Scheduled Monument, a Saxon Shore fort,

Roman port and associated remains at Richborough located approximately 900m west of the Site.
The nearest listed building (Grade I listed) is located approximately 950m west of the Site.

- 6.52 The Proposed Development is highly unlikely to result in any physical impact to any designated assets. It is not expected that any breaking of ground is required, and therefore no potential for impacts.
- 6.53 It is also important to note that the Site is located within an extensive business park and the Proposed Development would be set in a backdrop of large industrial buildings. It is not expected that the introduction of several containers would change the setting of the industrial park and therefore no impacts are likely on the setting of historical assets offsite.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This full planning application seeks permission for the *‘Installation of a Battery Energy Storage System (BESS) and associated infrastructure’*.
- 7.2 The principle of renewable energy, such as electricity storage, is supported by national and local planning policy. Furthermore, the UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050. DDC has also declared to be a zero emitter by 2030. Therefore, there is an urgent, significant and demonstrable need for the Proposed Development, as set out in Section 4 of this statement.
- 7.3 The Applicant has attempted to seek pre-application advice from DDC. However, the formal pre-application advice has not been received at the time of submission. Having considered the project programme, the planning application has been submitted before formal advice is received. It should be noted that the Applicant does intend to review the pre-application advice and make any clarifications as necessary once the it is received from the Council.
- 7.4 This statement has demonstrated that the Proposed Development is compliant with national and local planning policy. Therefore, this planning application should be granted approval.

