COMMITTEE REPORT

ITEM NUMBER: 7

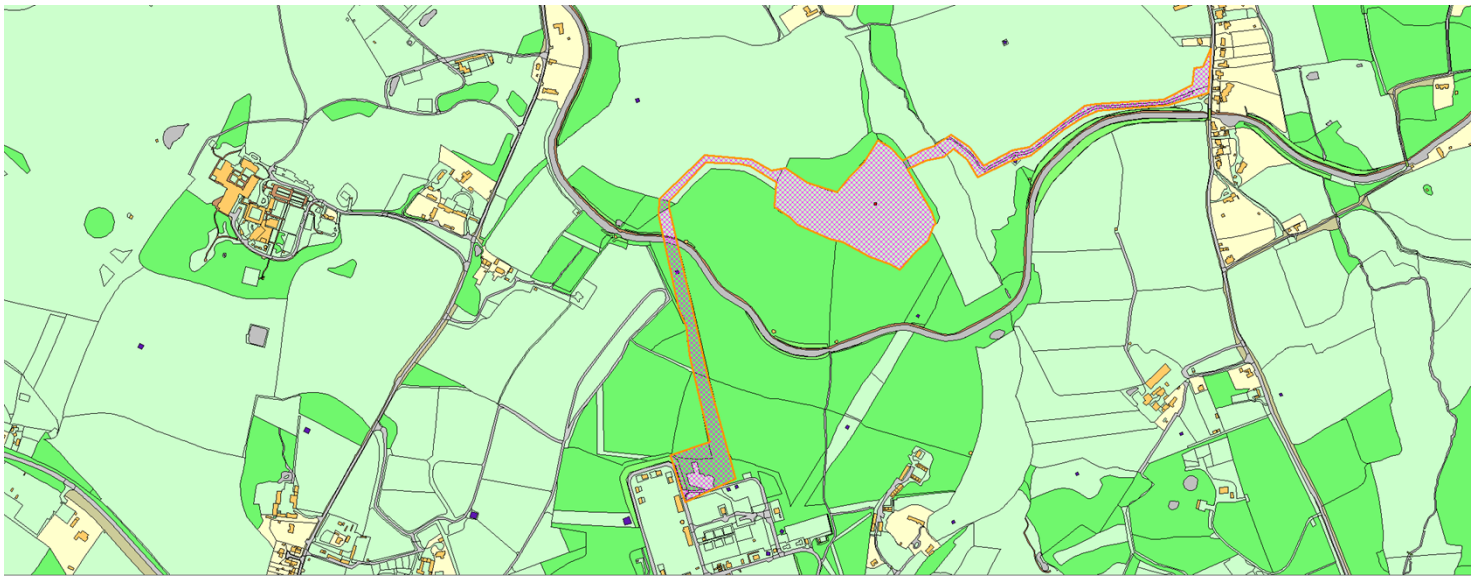
APPLICATION NO.	23/00823/FUL
LOCATION	Land at Ormersfield Farm, Crondall Road, Crookham Village, Fleet
PROPOSAL	Installation of an energy storage facility comprising of battery containers, fencing, switching station, kiosk and associated works.
APPLICANT	Fleet Green Limited

CONSULTATIONS EXPIRY 26th March 2024 (partial re-consultation)

APPLICATION EXPIRY 28th April 2024 (extension of time)

WARD Odiham and Church Crookham West and Ewshot

RECOMMENDATION **GRANT,** subject to conditions.



BACKGROUND

The application is bought to Planning Committee at the discretion of the Executive Director – Place in accordance with the Council's Constitution, due to the nature of the proposal and its strategic significance. It has been concluded that the proposal is not a departure from the Development Plan, despite being advertised as such on a precautionary basis.

DESCRIPTION OF THE SITE

The application site includes land adjacent to Crondall Road, from where the site is accessed. The application site includes land to the south of an agricultural field (approximately 5.1 hectares) and land where a proposed cable route would run. In total the application site is 10.2 hectares. The application is supported by a topographical survey which shows the change in levels across the site.

Fleet National Grid Sub Station lies to the south. There are electricity pylons within the application site.

The application is close to the Basingstoke Canal (which has a towpath), Itchel Brook and an unnamed watercourse. There are existing crossing points over the Brook. The Basingstoke Canal is both a Site of Special Scientific Interest (SSSI), and a Conservation Area.

The agricultural field where the equipment is proposed to be sited is surrounded by woodland and tree belts. Coxmoor Wood is to the south of the main parcel of land within the application site and is an ancient woodland and local Site of Importance for Nature Conservation (SINC) and forms a Priority Deciduous Woodland Habitat. Cunninghams Row (located to the north of the application site) and Coxmoor Wood form part of the Green Infrastructure network.

No Public Rights of Way (PRoW) run through the site. The nearest footpath is (PRoW 066/1/4) approximately 250 metres to the north of the proposed battery storage facility.

The land where the battery energy storage system (BESS) is proposed to be located is identified as Grade 4 'Poor' land.

The site is in a countryside location in planning terms as it falls outside of any defined settlement in the Hart Local Plan 2032 (HLP32).

PROPOSAL

The application seeks full planning permission for the installation of a battery energy storage system (BESS) with associated infrastructure and works including access to the public highway.

The proposed development is designed to strengthen the National Grid by providing instantaneous energy balancing services. This is achieved by storing energy produced when demand is low or there is an over-supply, which can be distributed when demand

increases. These systems mitigate the intermittent nature of renewable energy generation sources and the proposal is essential to the integration of these renewable energy sources into the national electricity supply infrastructure.

The application seeks full planning permission for the installation of a BESS, which would be sat on a permeable base. The battery containers are of a shipping container design. The BESS comprises:

- 23 battery containers (2.9 metres high (a maximum height of 3.5 metre including the plinth they are proposed to stand on), 12.2 metres by 2.4 metres)

- 27 inverter stations (3 metres by 2.4 metres with a maximum height of 3.5 metres on a plinth)

- 14 auxiliary transformers (Contained within a steel wire fence 2 metre high sat on a plinth, the enclosure would be 4.1 metres square)

- Fencing (2.4 metres high comprising of steel wire mesh and includes gate access)

- Switching room (11.7 metres by 4 metres with a maximum height of 4 metres on a plinth).

- Control room with attached weather station pole and antenna. (The proposed control room is 6 metres by 3 metres with a maximum height of 3.9 metres on a plinth. The proposed weather station pole would be 5.7 metres).

- CCTV poles (maximum height 3 metres)

- 8 water towers (circular 2.6 metres high and diameter 2.4 metre)

- Earthworks on part of the site

- The battery units would be served by a heating, ventilation and air conditioning system.

The proposed BESS itself occupies an area of approximately 0.5 hectare.

The proposals include two methodologies for cable laying: open excavation and horizontal directional drilling. The route of the cables is proposed to be adjacent to the existing pylons west of the battery storage facility though Coxmoor Wood leading direct to Fleet Substation. The cable is proposed to be directionally drilled under the Basingstoke Canal.

Part of the proposals is the replacement of two informal bridges, across an unnamed watercourse and Itchel Brook, with two clear span bailey bridges set on concrete foundations on crushed aggregate ramps. The bridges would be 6.5 metres high and span 9.7 metres and 12.7 metres. The proposals also include two attenuation basins and eight water towers.

The proposed BESS would be connected to Crondall Road by a proposed access road, mainly running along the southern side of an agricultural field. The proposed access track would be approximately 800 metres long, there would be passing points incorporated into the design, linking to a circular access road around the BESS. The proposed access road would be between 3.5 and 6 metres wide, comprising of permeable aggregate sat on geotextile and compacted soil.

A temporary compound (75 metres by 50 metres) would be sited adjacent to the proposed BESS during construction.

During the course of the application the following updated and revised information has been submitted:

- Arboricultural Impact Assessment (AIA), updated to provide clarification
- Revised Proposed Site Plan (change to internal access road)
- Updated information on drainage including drainage strategy, basin calculations and exceedance flow information
- Biodiversity
- Fire/safety management

The lifetime of the battery storage site is 40 years, after that period the site would be decommissioned, and all equipment removed.

RELEVANT PLANNING HISTORY

24/00070/FUL
Construction of an alternative underground cable route and associated works between Alton Road (B3349) and the Fleet Substation. – Pending consideration

The proposal seeks to amend the cable route and associated work that were approved under application ref: 21/03250/FUL.

21/03250/FUL
Installation of underground cable route and associated works between Alton Road (B3349) and the Fleet Substation. – Granted 07/10/2022

The cable route would run to the following Solar Farm.

<u>Chosley Farm, Bidden Road, North Warnborough</u>

20/03185/FUL
Construction of a Solar Photovoltaic Farm with an output capacity not to exceed 49.9MW of energy, with associated battery storage and supporting infrastructure including inverters and a transformer, fencing, CCTV installation and landscaping works. – Granted 11/11/2021

22/01997/EIA
Scoping Opinion: Proposed installation of a battery energy storage system with associated infrastructure. – Opinion Issued 28/10/2022

22/01457/EIA
Request for a screening opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for the proposed installation of a battery energy storage system with associated infrastructure. – Opinion issued 25.07.2022

19/01186/FUL
The proposed development of a 49.9 MW battery storage facility on land adjacent to Fleet 400kV substation, with ancillary equipment, fencing, CCTV and access track. – Withdrawn 30/12/2019

Other applications for similar proposals in the district which are considered to be relevant to the determination of this application are:

Penn Croft Farm, Penn Croft, Crondall

21/02937/FUL
Installation of an energy storage facility comprising of battery containers, fencing, switching station, kiosk and associated works. – Granted 30/01/2023 (dealt with as a departure at Planning Committee, determined by Council.

Land at Rye Common Lane, Crondall

22/02917/FUL
Proposed energy storage facility encompassed by 2.4m high palisade fencing and 3.7m high acoustic fencing to provide energy balancing services to the National Grid and access to the public highway. – Granted 22/05/2023 (dealt with as a departure at Planning Committee, determined by Council.

22/02392/PREAPP
Proposed Battey Energy Storage Facility – Opinion Issued 13/10/2022

20/01180/FUL
Proposed energy storage facility to provide energy balancing services to the National Grid. – Refused 11/12/2020. Appeal Allowed 28/09/2021.

Little Holt, Holt Lane, Hook

16/01789/FUL
Erection of storage containers, support infrastructure and security fence for Battery Energy Storage facility. – Refused 11/11/2016. Appeal Allowed 16/05/2017.

RELEVANT PLANNING POLICY

Section 38(6) of the Planning and Compulsory Purchase Act (PCPA) 2004 (as amended) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The application is considered to be a departure from the Local Plan as there are no policies which allocate such development at this site and no relevant policies

for the determination of energy storage proposals. The Council may depart from development plan policies where material considerations indicate that the plan should not be followed, in line with s38(6) of the PCPA 2004.

The relevant Development Plan for the District includes the Hart Local Plan (Strategy and Sites) 2032 (HLP32), Crookham Village Neighbourhood Plan (CVNP), Dogmersfield Neighbourhood Plan (DNP) and saved policies from the Hart District Local Plan (Replacement) 1996-2006 (HLP06). Adopted and saved policies are up-to-date and consistent with the NPPF. The relevant policies are as follows:

Hart Local Plan (Strategy and Sites) 2032 (HLP32)

SD1 Sustainable Development
SS1 Spatial Strategy and Distribution of Growth
ED3 The Rural Economy
NBE1 Development in the Countryside
NBE2 Landscape
NBE4 Biodiversity
NBE5 Managing Flood Risk
NBE6 Water Quality
NBE8 Historic Environment
NBE9 Design
NBE10 Renewable and Low Carbon Energy
NBE11 Pollution
INF1 Infrastructure
INF2 Green Infrastructure
INF3 Transport
INF4 Open Space, Sport and Recreation

Saved Policies from the Hart Local Plan (Replacement) 1996-2006 (updated 01.05.2020) (HLP06)

GEN1 General Policy for Development
GEN6 Policy for noisy/un-neighbourly developments
CON8 Trees, Woodland & Hedgerows: Amenity Value
CON10 Basingstoke Canal
CON23 Development affecting Public Rights of Way
RUR32 Basingstoke Canal

The majority of the access track connecting the site to Crondall Road is within the Crookham Village Neighbourhood Plan area. The Dogmersfield Neighbourhood Plan area covers land forming the battery storage site and cable route.

Crookham Village Neighbourhood Plan (CVNP) 2016-2032 made May 2021

SB01 Settlement Boundaries
BE01 Sustainable Development Principles
BE02 General Design Principles, Including New Developments
BE06 Prevention of Flooding
PA02 Basingstoke Canal Conservation Area

PA04 Protection of Historic Assets
NE02 Preserving Key Views
NE05 Protecting Biodiversity

Dogmersfield Neighbourhood Plan (DNP) 2016-2032 (made September 2019)

DNP1 A Spatial Policy for the Parish
DNP3 Design in the Setting of the Conservation Areas
DNP4 Local Views
DNP6 Landscape
DNP7 Biodiversity
DNP8 Trees and Hedgerows
DNP11 Dark Skies
DNP15 Sustainable Drainage

Relevant Guidance

National Planning Policy Framework (NPPF) December 2023
Planning Practice Guidance (PPG)
National Policy Statement for Overarching Energy (NPS1)
Hart District Landscape Assessment (HDLA, 1997)
Hart Landscape Capacity Study 2016 (HLCS)
Hart's Strategic Flood Risk Assessment 2016
Hart's Climate Change Action Plan
Hart's Equality Objectives for 2021 – 2023
Hart's Biodiversity Technical Note (2024)
Hart's Basingstoke Canal Conservation Area Character Appraisal and Management Proposal (2009)

CONSULTEE RESPONSES

Dogmersfield Parish Council (DPC):

10.01.24: Objection

Background

Additional information supplied regarding drainage, biodiversity and fire/safety management.

Comments

DPC submitted an objection to this application on 18 May 2023 and would take this opportunity to emphasise that this is a significant development in the countryside on agricultural land in contravention of many HLP and DNP policies. It represents significant incremental damage to the countryside with inadequate compensation and the potential of environmental harm due to potentially hazardous leakages particularly in the event of a fire. The applicant's current response to our concerns is in our opinion inadequate.

Grid-scale battery storage is an emerging technology and it is increasingly clear that battery storage sites can be a significant fire risk with the potential for personal injury and environmental damage. All potential risks need to adequately mitigated including adequate access for the fire service every day of the year regardless of the wind direction. Fire prevention and management should be a fundamental consideration for this application and we fully support the comments of Hampshire Fire Service and, in particular, that full details of battery chemistry and fire management systems should be available before a planning decision is made rather than, if approved, dealt with as a condition.

Summary

This development represents erosion of the countryside contrary to the DNP coupled with significant risk of fire and environmental damage.

On this basis DPC strongly objects to this planning application.

18.05.23: Objection

Background

This application is for the development of an energy storage facility on agricultural land close the Basingstoke Canal conservation area which is close to a number of residences and which will likely be visible and potentially adversely impact 2 important views identified in the DNP.

It is the third Battery Energy Storage System proposed in or close to Dogmersfield and as such there is an increasingly cumulative effect on the Parish in terms of erosion of the countryside, adverse impact on the landscape, noise and potential risk from pollution particularly in the case of a fire.

Overall comment

Whilst we accept the need for Battery Energy Storage Systems to support the National carbon neutral strategy and acknowledge that the Fleet sub-stations represent an ideal location for them, as noted above this is the third application in or close to Dogmersfield and there are many others in Hart.

We would ask that HDC take a strategic view of these applications rather than considering them individually and develop a strategic plan for such developments (including solar farms) to support their initiatives around climate change. We would further request that any decision in respect of this application is only made after the development of such a strategic plan and that each application is viewed as part of the overall strategy including the cumulative effect on communities rather than individually on a case-by-case basis.

DNP and LP conflicts This application is in direct contravention of inter alia the following Hart Local Plan ('LP") and DNP policies:

1. LP NBE 1 and DNP Policy 1 - development in the countryside. Development proposals in the countryside and outside the boundaries of the Conservation Areas should only be supported if they are designed to provide appropriate facilities for rural enterprise, agriculture, forestry, or leisure, and to do so in a manner which demonstrably benefits the rural economy without harming countryside interests.

2. LP NBE 2 and DNP Policy DNP 6 - Landscape. Development proposals should respect the main distinguishing features and special characteristics of the landscape and proposals should demonstrate as part of a landscape appraisal how the character and visual amenity of the landscape will be enhanced through an appropriate and proportionate landscaping scheme that successfully integrates the proposal into the landscape. In particular the site is likely to be visible from views 30 and 32 identified as important in the DNP and may be visible from one or more residences at certain times of the year.

3. LP NBE 4 and DNP Policy 7 - Biodiversity. This proposed development is sited on agricultural land close to the Basingstoke Canal conservation area and there is inadequate recompense proposed for the loss of countryside and impact on a conservation area.

4. DNP 11 - Dark Skies. All development proposals should be designed in a way that does not require external lighting or the use of street lighting to minimise the occurrence of light pollution. Proposals for any necessary street and external lighting should comply with the current guidelines established for rural areas by the Institute of Lighting Professionals (ILP).

Other matters

1. Although a detailed noise impact assessment has been produced this does not seem to take account of the cumulative effect of the other BESSs approved or in process of approval. In addition, the noise impact assessment assumes "typical technology" without noise mitigation. If approved the actual noise levels of the technology to be used should be assessed, mitigation added as necessary, constantly monitored throughout the life of the project and steps taken to ensure that the actual noise does not exceed that assumed in the assessment at any time of the day or night.

2. Although the site is moderately well screened in the summer it relies on hedges and woodland outside the site which may still be visible from a number of residences and as noted above may impact important views set out in the DNP. The overall landscaping seems inadequate to fully screen the facility at all times of the year and needs to be increased particularly with evergreen species - there is no provision for on-going monitoring and maintenance to maintain the required level of screening.

3. There is no Fire Management/ Safety Plan which is fundamental to the safety of the Parish. We support the comments of Hampshire Fire and believe that all their recommendations should be implemented particularly around mitigation of environmental harm due to potentially hazardous leakages in the event of a fire.

4. There is no assessment of emissions from the batteries which should be considered on a cumulative basis with other BESSs approved or under consideration.

Summary

This is a significant development in the countryside on agricultural land in contravention of many HLP and DNP policies. It represents significant incremental damage to the countryside with inadequate compensation and the potential of environmental harm due to potentially hazardous leakages particularly in the event of a fire.

On this basis the DPC objects to this planning application.

Should this application be granted we would respectively request that consideration be given to compensation under s106 for the erosion of the countryside and other impacts on the Parish of (say) £30,000.

Crondall Parish Council (CPC):

28.04.23

CPC is supportive of the principle of the development, but does have significant concerns around fire safety and unplanned atmospheric emissions. Specifically, whilst reference is made to fire being taken into account in the design, there is no reference (or sight) of a Battery Fire Safety Management Plan included in the application.

Crookham Village Parish Council (CVPC):

11.01.24: Objection

Revised_08.12.23_Proposed_Site_Plan: Battery units only 2m apart with operational area in close proximity to adjacent vegetation leaving large area of site empty.

Site_Specific_Risk_Engagement_Document

Input from the Fire Service is limited to statements of policy rather than assessment of proposal. Detailed assessment of proposals against policy, plus formal approval by Fire Service, should be required before approval could be considered. In particular, spacing of the battery units is much less than the 6 metre mentioned.

Access to the western water tower from site entrance likely to be obstructed by site of a battery fire, especially if it spreads to adjacent battery units. It also suggests that fire service response will be limited to water on adjacent areas leaving batteries to burn out. Access to adjacent woodland at risk of spreading fire not addressed.

Street Scene

Effect on the street scene in the Canal Conservation Area remains to be addressed. Highways may be happy with proposal from their perspective, but removal of roadside vegetation to satisfy their requirements would have a serious detrimental effect on the

street scene. Full consideration should be given to the option of requiring a banksman as proposed by the applicant to remove the need for wide visibility splays.

04.05.23: CVPC objects to:

- Lack of rigorous analysis of, and detailed mitigation measures to address, emissions risk to downwind residents should there be a battery fire on the site.

- The effect on the street scene in the Basingstoke Canal Conservation Area of a 43m visibility splay requiring removal of roadside vegetation that does so much to set the context of that section of Crondall Road. The application states that a banksman (OCTMP document para 2.5) will manage vehicle entry and exit, which should remove the requirement for such a wide splay. Conditions are requested to limit vehicle sizes, constrain access times to avoid rush hour traffic along Crondall Road and, if necessary, to require continuing banksman supervision of vehicular entry and exit after construction is complete.

Canal and River Trust (External)

22.12.23 and 29.06.23

This application falls outside the notified area for its application scale and location.

Basingstoke Canal Authority (External)

No response received.

Basingstoke Canal Manager (External)

No response received.

Southern Gas Networks (External)

22.12.23

This application falls outside of Cadent's distribution network. Please contact your local Gas distributor and/or National Grid for comments on this application.

Hampshire Fire and Rescue (HFR) (External)

01.02.24

Insufficient information is currently in place to demonstrate the suitability of the proposals in terms of fire safety.

Refer to “Grid Scale Battery Energy Storage System Planning” produced by National Fire Chiefs Council. This guidance asks for information over and above the level of detail that would typically be expected at planning stage. The reasoning for this is that once planning permission is granted to BESS sites there are very few fire safety

regulations that will apply to the site. It is therefore important to ensure all safety matters are identified and set out as part of the planning process.

Further consideration needs to be given to:

1. The information provided does not consider how the run-off of large volumes of potentially contaminated firefighting water would be managed.

2. The scaled plan provided indicates that the distance between BESS units has been reduced to approximately 2 metres. This is a significant reduction from the 6m recommendation within NFCC guidance.

   The applicant has referenced FM Global Property Loss Prevention Data Sheets 5-33 as justification for discounting the 6m space separation requested by NFCC. This document makes various recommendations on minimum spacing between units depending on the chosen battery chemistry and/or suppression systems in place, several of which exceed the 2 metres spacing currently shown on the plans provided.

   Any reduction in BESS separation would be expected to be justified through an evidence-based approach that demonstrates fire cannot spread beyond the unit of origin. This can be evidenced through UL9540A testing, though no such test information has been provided at this stage.

3. Details of the battery safety management plan, detection systems, suppression systems and ventilation systems are currently unclear.

4. Details of the proposed battery chemistry have not been provided. Please note that the specific chemistry of lithium-ion batteries has a significant impact on the duration of a fire, the intensity of the fire and the firefighting response required to manage an incident.

The majority of the above items can be addressed at a later stage as part of a planning condition (such as that suggested within the Site-Specific Risk Engagement document). Please note however that this approach would limit the ability of the applicant to increase the space between units if the current unit spacing is not demonstrated to be suitable.

Strongly recommend that consideration is given to installation of an Automatic Water Fire Suppression Systems (AWFSS) to promote life safety and property protection within the premises.

09.05.23

Access and facilities for Fire Service Appliances and Firefighters should be in accordance with Approved Document B5 of the current Building Regulations. Access to the proposed site should be in accordance with Hampshire Act 1983 Section 12 (Access to buildings within the site will be dealt with as part of the building regulations application at a later stage). Fire and Rescue Services Act 2004.

Evidence has shown that fires involving BESS units cannot be effectively extinguished through conventional means. The following items should be given due consideration by both the applicant and planning authority in order to ensure a fire involving BESS can be safely contained.

Firefighting Arrangements:

Manufacturers of BESS units have issued advice to emergency services. This advice states that attempting to extinguish a fire involving BESS is likely to prolong the incident with very little benefit. This has been proven accurate by real world fire events involving BESS units.

It is unlikely that the Fire Service would attempt to extinguish a fire involving one of these units. Instead, in the event of fire, it is likely that crews would limit their activity to preventing fire spread between units, allowing a controlled burn-out of the affected unit to occur. This is likely to result in the complete loss of the unit and restricted access to the site for the duration of the fire.

This should be communicated to any prospective insuring bodies for the site.

Access Roads:

Where BESS units are involved in fire, it is likely that the Fire Service would require a variety of vehicles to effectively manage the incident. The BESS units are accessed by a single dead-end access road. It is unlikely that this road can be used to mount an effective firefighting response.

It is strongly recommended that additional roadways be created within and around the site to allow for effective management of a fire incident.

Firefighter Safety:

Where BESS units are involved in fire, an overpressure within the affected unit is likely to occur. This may present a serious hazard to the health and safety of nearby firefighters.

Unless this risk is effectively mitigated it is unlikely that attending crews will approach the site. Management arrangements for mitigating this risk may involve suitable ventilation provision within the units and/or the provision of blast walls.

Separation:

In order to restrict fire spread and limit the potential environmental damage, it is essential that suitable space be maintained around each container forming part of the BESS. If this space is not provided this may allow rapid fire to spread to nearby units and will severely hamper firefighting efforts.

Consideration should also be given to the provision of automatic suppression systems within each container to delay fire spread to neighbouring BESS units.

Environmental Impact:

Premises' occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages. Fire-water run-off where

BESS units are involved in fire may contain a large amount of contaminants that may have a substantial negative impact on the local water environment.

A suitable strategy should be in place to manage fire-water run-off and prevent pollution.

Fire Protection:

The Fire Service strongly recommend that consideration is given to installation of an Automatic Water Fire Suppression Systems (AWFSS) to promote life safety and property protection within the premises.

Health and Safety Executive (HSE) (External)

22.12.23

Reviewed new information, previous response made to you on 19th April 2023 still applies i.e. the application does not fall within any HSE consultation zones and the HSE LUP team has no comment to make.

If the development involves a new substation or the storage of electrical energy such as in a large battery storage unit and the development is proposed adjacent to a COMAH (Control of Major Accident Hazards) establishment then please consult the operator of the COMAH establishment.

If the development involves a substation or the storage of electrical energy such as in a large battery storage unit and is proposed in the vicinity of a nuclear site, the Office for Nuclear Regulation (ONR) does wish to be consulted over such proposals.

National Grid Plant Protection Team (External)

No response received.

National Grid Asset Protection Team (External)

11.01.24

National Grid Electricity Transmission have no objection provided the developer has the necessary agreements with National Grid for their connection into Fleet substation and their cable easement on NGET land. Please note this response is only in reference to National Grid Electricity Transmission assets only.

National Gas (External)

There are no National Gas transmission gas assets affected in this area.

A query can be raised to view if there are any other affected assets.

Environment Agency (EA) (External)

20.03.24 Overcome previous objection, recommend a condition requiring submission of a landscape and ecological management plan.

The proposals involve works adjacent to, over and within the Itchel Brook, a Main River. The works impacting the watercourse and ecological enhancements that have been proposed as ecological compensation, will require a management plan to be in place. This will ensure the landscape provides a maximum benefit to people and the environment. In light of the above, the proposed development will only be acceptable if a planning condition requiring a landscape and ecological management scheme is included. To ensure the protection of wildlife and supporting habitat in line with the NPPF, which recognises that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Without this condition the EA would object to the proposal because it cannot be guaranteed that the development will not result in significant harm to the Itchel Brook, in line with the NPPF.

Contaminated runoff / risk to water environment

In the event of a fire at a BESS currently it is considered best practice to let the containers on fire burn out. However, water is likely to be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, water could enter exposed containers through rainfall during the period of time it takes to remove, or cover burnt out containers. There is a risk that highly polluting chemicals in batteries could enter groundwater or surface water in firewater or rainfall.

The local fire and rescue service have referenced the difficult nature of lithium fires in terms of extinguishing them. In their response there is a section called 'environmental impact' and they ask that the applicants have a suitable strategy in place to manage fire water runoff, as the runoff will contain a large amount of contaminants that "may have a substantial negative impact on the local water environment". The EA advise that the operators put in safeguarding measures to deal with firewater/foam in the event there is a fire requiring the containment of any firewater runoff. Such as bunding the site and sealable drains to basically make the site one large “holding tank” in the event there is a fire water risk loss. Furthermore, to have an impermeable floor to the site if there are springs in the area. There is a risk that contaminated runoff could flow into the Itchel Brook and then the River Hart which could cause significant harm to the water environment. It is up to the LPA to recommend measures to this effect.

Energy storage will play a significant role in the future of the UK energy sector. Effective storage solutions will benefit renewables generation, helping to ensure a more stable supply and give operators access to the Grid ancillary services market. Currently, DEFRA does not consider the need to regulate the operation of BESS facilities under the Environmental Permitting Regulations regime. These facilities also do not currently fall within the Control of Major Accident Hazards Regulations.

Although these are a source of energy to the National Grid they do not result in a direct impact to the environment during normal operations. However, the potential to pollute in abnormal and emergency situations should not be overlooked. Applicants should consider the impact to groundwater and surface waters from the escape of firewater/foam and any metal leachate that it may contain. Where possible the applicant should ensure that there are multiple 'layers of protection' to prevent the source pathway-receptor pollution route occurring. In particular, proposals should avoid being situated near to rivers and sensitive drinking water sources.

An important factor that can be overlooked by parties involved in new battery storage projects or investing in existing projects is that battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs, but on the positive side, the regime also creates opportunities for battery recyclers and related businesses. Operators of battery storage facilities should be aware of the Producer Responsibility Regulations. Under the Regulations, industrial battery producers are obliged to:

- take back waste industrial batteries from end users or waste disposal authorities free of charge and provide certain information for end users;
- ensure all batteries taken back are delivered and accepted by an approved treatment and recycling operator;
- keep a record of the amount of tonnes of batteries placed on the market and taken back;
- register as a producer with the Secretary of State;
- report to the Secretary of State on the weight of batteries placed on the market and collected in each compliance period.

Putting aside the take back obligations under the producer responsibility regime, batteries have the potential to cause harm to the environment if the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place. Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.

The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.

Notes on other consents and Environmental Permits.

02.02.24: These comments are included in this report for completeness but it should be noted that the EA's objections have now been addressed.

(commenting on additional information).

Maintain objection due to the likely effect this will have on the Itchel Brook and its habitat, recommend that planning permission is refused.

Insufficient details of mitigation or compensation measures have been submitted to address any identified risks to the Itchel Brook and its habitat. As submitted, the proposals will not create valuable habitat that will provide a meaningful gain in biodiversity. Furthermore, the measures set out will not provide any compensation to the Itchel Brook itself. This objection is supported by the NPPF, which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity.

A River Condition Assessment and BNG assessment have now been submitted for the Itchel Brook. This states that the replacement of the bridge over the Itchel Brook would result in the loss of 0.06 river units.

While the river remains in moderate condition, this loss is due to an increase in watercourse and riparian zone encroachment due to the bridge foundations being located on the riverbanks and the presence of an access road.

It is suggested that the creation of 0.055km of a ditch in poor condition would translate to an increase of 11.29% river units. Having viewed the 'Detailed Landscape Proposals' drawing, this ditch creation seems to be an isolated feature, not connected to any other water feature (ditch/stream etc). There is no information explaining the reasoning behind why the applicants have decided to create this feature or how this feature will enhance the local environment, especially considering it has been stated that it will be created in 'poor' condition. No design details of this ditch creation have been provided.

To overcome our objection, meaningful biodiversity gains should be proposed, that will contribute towards compensating for the impacts the development will have on the Itchel Brook. This could be in the form of, for example, in channel enhancements to the Itchel Brook. Please reconsult us on further information that is submitted.

Environmental permit information, other consents and contaminated runoff/risk to water environment - see later comments.

18.07.23: Objection

Part of the application site lies within Flood Zone 3 according to the EA Flood Map for Planning. This is defined as areas having a high probability of flooding in accordance with Table 1 ‘Flood Risk’ of the PPG. The application also includes a crossing of a statutory main river, the Itchel Brook.

The EA raise concern that the proposed development has not assessed the watercourse element of the biodiversity net gain metric.

The EA object to the crossing of the Itchel Brook and infringement into the riparian zone proposed as part of this planning application due to its likely effect on the Itchel Brook. This habitat is listed as being of ‘principal’ importance under section 41 of the

Natural Environment and Rural Communities (NERC) Act 2006. The EA therefore recommend that planning permission is refused.

England's Biodiversity strategy identifies those priority habitats which are also listed as being of 'principal' importance under section 41 of the NERC Act 2006. This Act states that local planning authorities must consider these habitats in their decision-making, because of their duty to conserve biodiversity (section 40).

In this instance, the proposed development may have a detrimental effect on a priority habitat that the EA have a role in protecting. The application does not include any river condition assessment information about the measures proposed to assess and address the risk to ensure protection of the Itchel Brook in this location.

In particular, no assessment of the Itchel Brook has been included in the Biodiversity Net Gain calculations and the EA recommend that the planning application should be refused. The EA would expect a river condition assessment to be carried out; and / or an assessment of biodiversity net gain for the watercourse element. The EA will maintain their objection until the applicant has supplied information to demonstrate that the river can achieve biodiversity net gains.

The proposed development has been assessed using the Defra metric and will result in a 37.73% net gain score for habitat units and a 100% net gain score for hedgerows. Appendix 6.5 of the Environmental Statement provides the headline results of this metric calculation and it can be clearly seen that the river element of the metric has not been included, which has a calculation of 0.00%. As this proposal includes work over the Itchel Brook in the form of a new clear span bridge, as well as an access road either side of the bridge which runs across the river corridor, the river should be included in this net gain assessment and 10% biodiversity net gain provided for the waterourse element.

This objection is supported by the NPPF which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. This objection is supported by HLP32 Policy NBE 4 (Biodiversity), which states that the overall aim is to achieve a net gain in biodiversity, not merely to avoid a net loss. Developments should therefore aim to achieve best practice and take opportunities to enhance biodiversity where possible.

To overcome the EA objection, the river element of the metric should be completed and a 10% biodiversity net gain for the river should be achieved.

Advice to LPA and applicant – Flood Risk Activity Permit The only part of this development that may be affected by flooding is the access to the site. There appears to be no details about the access, this may have been developed through phase 1 of this work. Should the access not be in place, any changes to the river crossing will require a flood risk activity permit for work with in 8 metres of main river.

We are unable to comment on any issues about the flood risk activity permit. Until the applicant submits appropriate information for this work, we will be unable to comment on our assessment of this.

Information on Environmental permits

Contaminated runoff/ risk to water environment (see comments in other consultation responses from the EA).

Natural England (NE) (External)

10.01.24

NE has previously commented on this proposal and made comments to the authority in our response dated 05 May 2023.

The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

05.05.23: No objection

NE considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Thames Basin Heaths Special Protection Area (TBH SPA) (European Site)

NE considers that the proposed development will not have likely significant effects on the TBHSPA and has no objection to the proposed development.

Basingstoke Canal Site of Special Scientific Interest (SSSI)

NE considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

Ancient woodland, ancient and veteran trees

NE advice remains that a 15m buffer should be secured between any development and the boundary to the ancient woodland. You should consider any impacts on ancient woodland and ancient and veteran trees in line with the NPPF. Refer to standing advice.

Fire Management Plan

NE note that a Fire Management Safety Plan has not been submitted in support of this application. Given the proposal is for battery energy storage, it would be advised that this is incorporated into the application to set out a clear safety and fire management strategy.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Hampshire County Council (HCC) Local Highway Authority (LHA) (External)

04.01.24

Unable to find any change in the proposal that responds to the contents of earlier consultation response dated 10 May 2023. Therefore, recommendation remains the same.

10.05.23 No objection subject to an amended access plan, conditions and note to Applicant.

This type of development has a concentrated period of traffic generation during the assembly period and when the site is de-commissioned. Because of the constrained nature of the local road network to the north of the site a Construction Traffic Management Plan will be required to cover the routeing of lorries to and from the site from/to the south.

The access location is within a 30 MPH speed limit which requires a major road visibility splay distance of 43m. The minor road distance required is 2.4m. and the height limit is between 1m. and 3m.

The access track is predominantly of single lane width with passing places to avoid vehicles having to reverse on to the highway a further passing place is required between the two sharp bends closest to Crondall Lane

Recommend conditions on Construction Traffic Management Plan, visibility splays and no gate or other obstruction by entrance.

HCC Archaeology (External)

04.01.24

No further comments at this time and would refer you to our previous comments dated 19/04/2023.

19.04.2023 Recommend condition: Archaeological watching brief.

Application supported by desk-based assessment. The response to the scoping opinion emphasised the need to review the impact on the General Headquarters Line (GHQ line) which dates to the Second World War and which utilised the canal as an invasion stop line. The desk-based assessment has reviewed the limited (non-industrial non-military) archaeological evidence for the area identifying that little is known/recorded. A walk over of the route also did not identify any upstanding archaeology within the impacted area. The assessment concludes that the impact is limited due to the low potential of the area and the impact does not amount to a significant impact. This is concurred with.

The only direct impact on the canal (canal fabric and GHQ line) is the crossing of the canal which will be achieved by directional drilling. The conclusion is that less than substantial harm would be caused.

The submission notes a precautionary statement that some provision will be made for an archaeological watching brief during "selected" construction ground works to be secured by use of a condition. It is recommended that an archaeological condition is attached to any planning permission which might be issued to secure an archaeological watching brief as mitigation of the impact of development. The County's Archaeologist is aware that the proposed mitigation would be selective and any submitted written scheme of investigation describing the provision of the mitigation should be explicit as to what groundworks have been selected and what groundworks will not be monitored, for the planning authority to consider as these are not explicit at this stage.

Lead Local Flood Authority (LLFA) (External)

21.03.24: No additional comments and comments from 08.01.24 remain valid.

08.01.24: No objection

The further information submitted has been reviewed, this information had been discussed prior to submission. The information provided resolved the outstanding issues raised by the LLFA previously. The LPA may wish to consider the flood risk at the access further, and the EA have some outstanding concerns in this area also.

21.04.23: Further information required.

The site itself is within Flood Zone 1 and is generally at very low risk of flooding from surface water, however parts of the access route are within Flood Zones 2 and 3 and other parts of the route are at an increased risk of flooding from surface water. More information is required on how these flow paths are to be maintained if the access route is to be built up in any way (however the FRA states that levels will not be changed). There may be issues with safe access and egress to and from the site in times of flooding. The EA may have further comments relating to the Flood Zones.

Infiltration is not viable as a drainage strategy at this location; therefore attenuation of surface water runoff is proposed, with restricted discharges to local watercourses. The design flow rates for the two vortex flow controls raise some concerns due to the low values used. Confirmation of the orifice diameters is required, as anything below 50mm is considered to be at risk of blocking. It may not be possible to achieve the equivalent of greenfield runoff rates off-site, however if only one discharge location can be utilised instead of two that may allow for reducing rates as far as possible.

Attenuation is proposed that provides sufficient volume for the 1 in 100-year storm event plus an allowance for climate change. It is not clear why the use of perforated pipes is proposed, especially in an area of high groundwater. Network calculations should be provided for the surface water drainage system, demonstrating that no flooding occurs for storm events up to the 1 in 30-year event plus a peak rainfall allowance, and that any flooding for the 1 in 100 year storm event does not adversely affect the development.

Flood exceedance flow routing has been considered but should be demonstrated on a plan. Water treatment has been considered and the proposals should mitigate the

pollution hazard from the development. Maintenance details for the SuDS system as proposed have been included.

In order for a substantive response to be provided, the following information is required:

- Clarification of orifice sizes for the proposed vortex flow controls, and an alternative strategy should these present a blockage risk. This may require reducing the number of outfalls and possibly increasing the allowable discharge rate off-site.
- Removal of perforated pipes from the drainage system.
- Network calculations for the entire drainage system to show no flooding for storms up to the 1 in 30-year event plus a peak rainfall allowance, and any flooding for the 1 in 100-year event should have the extent shown on a plan.
- Flood exceedance flow routes should be shown on a plan.
- Consideration should be given to safe access and egress, the LPA may wish to investigate this further.

Conservation (Internal)

10.01.24

Identification of adjacent heritage assets and a planning statement that addresses heritage issues has been included with the application.

The principal concerns regarding this proposal are the construction of the access road adjacent to the canal and works associated with the installation of an underground cable that will require drilling under the canal and possibly works to the area around the canal during construction.

The proposed access road runs for the most part along an existing informal gated access track. This would be replaced with a single width gravelled road with passing points. It is considered that the formalisation of the route would cause a level of harm to the setting of the conservation area, however, views out from the canal are limited by the adjacent existing vegetation. The construction works noted in the supporting documents would cause a higher level of harm but would be temporary in nature.

Provided the route was maintained with a gravel or hoggin surface, so that it had the appearance of a farm track, it would cause a low-level of harm to the setting of the adjacent conservation area and the nearby Locally Listed buildings. Given the distance from the canal and the presence of intervening buildings, it is considered that the works would not cause any harm to the setting of the Crookham Conservation Area or that of the two listed buildings noted.

Details of the works within the Basingstoke Canal Conservation Area to run the cable between the two sites will be required to ensure that the canal, tow path and embankments are not damaged, or if this does occur are suitably reinstated.

When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF advises that great weight should be given to the

asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

It is considered that the proposed development would cause a low level of less than substantial harm to the Basingstoke Canal Conservation Area and its setting, and that in terms of the heritage balance noted in the NPPF, the public benefit of the scheme would need to outweigh the harm caused.

Duties under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas Act) 1990 relating to listed buildings and conservation areas are relevant to the consideration of this application. In particular, the requirement to consider the desirability of preserving the building or its setting, or to preserving or enhancing the character or appearance of a conservation area.

The proposal will cause a low level of harm to the conservation area and its setting, and should the proposal be acceptable in planning terms, then conditions to protect the conservation area during and after the completion of the works should be considered.

Drainage (Internal)

31.05.23: Due to the size of the proposed development, guided by LLFA and agree with the requirement for more information relating to surface water drainage.

Ecology (Internal)

18.03.24, 22.12.23 and 19.05.23

No objection subject to a condition that a Construction Environmental Management Plan be submitted.

The River Condition Assessment Technical Note and Biodiversity Net Gain (BNG) Assessment details minor loss of river units due to foundations of the proposed bridge, which will be subsequently compensated for utilising on site BNG habitat creation and in-channel/riparian enhancements as requested by the EA. While the BNG habitat creation does not reach the desired 10%, in this instance the mandatory 10% does not apply, and by agreement with the applicant and the EA it was decided that meaningful channel improvements to the main river were preferable despite the improvements not being reflected in the metric. This approach is accepted, there are no additional comments regarding additional revised documents and previous comments apply.

The ecology surveys detailed within the Environment Statement assessed the potential for the site to support protected species and the need for any further survey work. Generally, the site is of low value although there are some areas/features with more interest. Of particular interest is the construction of the bridge crossing over Basingstoke Canal SSSI.

The design of the bridge is such that it should clear span the banks of the SSSI, causing minimal impact to the features of the SSSI at this location. The outline

Construction Environmental Management Plan (CEMP) details protection measures to be undertaken, with further detail proposed in a CEMP submitted later via condition. This approach is accepted.

Protected species: the report makes recommendations including best practice approaches and supervised clearance of the site. This approach is supported.

Environmental Health (Internal)

03.01.24: No objection and no further comments to make apart from those previously submitted on the 24th May 2023.

24.05.23: No objection subject to conditions

In consideration of the construction phase of the project, and the nearby sensitive residential premises, it is recommended that a condition to restrict hours of construction works be imposed.

The CEMP recommends that a site-specific Construction Management Plan (CMP) is provided via condition prior to commencement of development.

The CEMP describes a surface-launched horizontal directional drilling technique. This is a potentially noisy operation and can be mitigated for by the working hours restriction, additional noise mitigation measures and noise monitoring. A Method Statement for the works would be helpful and can be provided to the Environmental Health Team prior to the commencement of the works.

Noise Impact Assessment (NIA): No objection

The NIA establishes background noise levels, which are representative of the nearest noise sensitive receptors. The proposed plant is detailed and is proposed to be a 24-hour plant operation where needed. The predicted specific noise levels at the nearest noise sensitive receptors are detailed and the rating levels are determined. The worst-case level is 36 dB(A) during the day-time period. Acoustic mitigation measures are not proposed. Although the specific plant has not been chosen, the information provided are robust acoustic specifications to be achieved by suitable plant selection and scheme design, such that acoustic feasibility is demonstrated for the purposes of planning consideration. If due to other design constraints, the selected plant does not use variable fan speed technology and the night-time noise emissions shown are not achievable via reduced fan duty (to be confirmed by the plant manufacturers) then the inverters should be fitted with a noise reduction kit, comprising external acoustic baffles to the air inlets and outlets, or housed within an acoustic enclosure capable of reducing the total sound power level to those presented. Similarly, when variable fan speed is not used on the battery cooling system, low noise HVAC systems or acoustic attenuators should be used to ensure that the emission levels presented are not exceeded. It is stated that, it is unlikely that the fans would normally reach a 100% duty cycle, and that at night-time fan duty cycle can be even lower due to less cooling demand. This assessment assumes 100% fan speed during the day and 40-50% during the night. Furthermore, all rating values are either equal to or not exceeding the background sound level and the absolute levels of sound are predicted to be low at

neighbouring properties. From BS4142 where background sound level and rating levels are low, absolute levels might be as, or more, relevant, than the margin by which the rating level exceeds the background. This is especially true at night.

Site Lighting: No objection

Lighting is required and would be affixed to the high voltage buildings, such lighting would only be used on rare occasions when the site is attended at times of insufficient natural light or in cases of emergency where out of hours work is essential. The site is not routinely lit, and very limited lighting is to used and only in cases of emergency out of hour works.

Tree Officer (Internal)

15.03.24| No objection subject to conditions on tree protection details, site storage details and a pre-commencement meeting.

An arboricultural impact assessment (AIA) has been prepared in accordance with British Standard 5837:2012 to support the development proposal. This has identified the crown and root constraints associated with the existing trees on and adjacent to the site.

The most important arboricultural feature relevant to the application site is Coxmoor wood which is designated Ancient Semi-Natural Woodland (ASNW). The NPPF is applicable including Standing Advice produced by the Forestry Commission and Natural England. A 15-metre buffer has shown to be applied to the ASNW.

The proposed development utilises an existing farm access track into the site, and existing field access points within the site. An existing wayleave has been cleared that bisects Coxmoor Wood for the past installation and ongoing maintenance of high voltage overhead wires that run north to south from the substation. The proposed route for the new cable passes through this existing strip which is not shown to be designated as part of the ASNW. The proposal does not require the removal of (or part of) any trees, tree groups, woodlands, or hedgerows, however some, very limited, cutting back of hedgerow vegetation at the existing agricultural access off Crondall Road, may be required to ensure suitable visibility splays are provided. This is considered acceptable and necessary to facilitate the development.

Two methodologies for cable laying will be used and the installation works will either take the form of an open excavation or a horizontal directional drill (HDD). The areas where the two different installation techniques are to be used are shown on the plan. HDD is a surface-launched drilling technique which will be required as part of the cable route at Coxmoor Wood to cross under certain infrastructure or natural elements (e.g. the Basingstoke Canal) which cannot be altered or disturbed. Where excavation techniques are to be used the new cable will typically be laid at depths of 1.2m and will be reinstated to the previous condition, as agricultural land, grassland or scrubland. Periodically there are some potential impacts to retained trees to establish some new access, construction, and maintenance tracks within the site interior. Where excavation is required to take place within the wayleave area through

Coxmoor Wood (trench or launch/receiver pits) it will be essential for a schedule of arboricultural monitoring to be put in place. The schedule of monitoring and supervision must be set out in detail as part of an Arboricultural Method Statement (AMS) to cover the work through Coxmoor Wood and thus planning conditions applied accordingly. Arboricultural monitoring and supervision is required to avoid, control or limit any potential root damage (>50mm).

Provided that the advice within the submitted report is followed and implemented accordingly, any potential arboricultural impacts will be maintained to a satisfactory level.

Landscape Manager (Internal)

07.03.24: Note the objections from other consultees.

The revised proposal extends the vehicular access within the main part of the site to provide a perimeter road around the battery storage compound. This has the potential, to some extent, to increase visual impact but will also materially increase the amount of hard surface in the countryside over and above the original proposal.

The loss of meadow area to hard surfacing should be offset by amending the planting proposals to include a mixed native hedgerow along the outside of the additional access road on the east, southern and western sides. The hedgerow should be positioned so that, as it develops in width to maturity, it does not conflict with the function of the perimeter road.

If minded to approve, can it be conditioned that only biodegradable spiral guards are used for the scrub and native hedgerow planting. In many cases and despite commitments to remove guards when they've fulfilled their function, they often remain and essentially become litter in the countryside, which is something to be avoided.

26.05.23

The characteristics of the proposal will have a fundamental effect on the character of the main compound area of the site, which currently is entirely rural. In this regard, the proposals are contrary to HLP32 Policy NBE2 Landscape.

Due to the low-lying topography in this part of the district, combined with the rural wooded features on all sides, including the proposed soft landscape enhancements, the effects of the industrial character are likely to be contained to the site compound area, with little or negligible impact on the landscape beyond. In this regard the proposals accord with NBE2 Landscape as they are able to integrate with the landscape and surroundings.

The main battery storage compound is located in open countryside just west of Itchell Brook (which feeds into the River Hart), north of the Basingstoke Canal and approx. 06km from the southern extents of Crookham Village. The landscape in this part of the district is open medium to large scale in parts, such as the large arable field west of

Crookham Village, mixed with low lying small to medium scale blocks of woodland, small copses, sometimes linear and well-treed hedgerows.

The main compound of the site sits within and is visually contained by several of these rural landscape features. South of the site is Swing Bridge Copse (part of Coxmoor Wood SINC-ASNW) which is a broad, dense area of woodland on the northern side of the Basingstoke Canal. North of the site is a broad curvy linear copse of trees and to the east two, broad well-treed hedgerows, one either side of the River Hart.

The access proposals appear to utilise an existing wide field entrance off Crondall Road, into the arable field mentioned above, just on the southern tip of Crookham Village. The construction of the access has a permeable gravel surface at 3.5m wide with two 6m passing places which is likely to have a low visual influence, although by Crondall Road it is has a broad sweep to allow for the turning restrictions of large vehicles. The site access does falls within the area of the Crookham Village NP.

Two bridges are proposed where the access track crosses the Itchell Brook and another smaller land drain watercourse.

In terms of public access, the Basingstoke Canal towpath lies south and appears to have no visual access through the densely wooded Swing Bridge Copse.

Approx. 0.3km to the north PRoW FP 1 (Crookham Village parish) runs east to west. Between the footpath and the site the land is low lying with angled, broad linear hedgerows and copses so that any visibility of the site would be negligible.

The application does also include proposals, as part of the LVA, to enhance the existing wooded features to the north and east of the site, further reducing the likelihood of visibility beyond (those features).

Although the soft landscape details provide plant species names and plant quantities, no plant sizes are given. Without all three pieces of this information, including means of protection e.g. rabbits/deer, the details as submitted are not sufficient but could be conditioned.

As with any planting scheme, establishment and ongoing care will be needed so a management plan could also be required by condition.

PUBLIC REPRESENTATIONS

Nine objections received, two representators appear to have made submissions twice, the representations relate to:

- Traffic generation and safety (including construction traffic)
- Appropriateness of access
- Noise
- Fire Risk
- Safety
- Impact on canal
- Inappropriate location (including should be closer to substation)

- Ancient woodland
- SSSI
- Agricultural land
- Acknowledge energy benefits.
- Contamination
- Impact on Conservation Areas and historic Park and Garden
- Potential future expansion
- Provision of Biodiversity Net Gain
- Respond to Fire Service consultation response.
- Visual Impact
- Light
- Wildlife
- Operating times
- Flood risk

CONSIDERATIONS

This application seeks full planning permission for the installation of a battery storage facility with an export capacity 57MW.

Principle of Development

The application site is located within the countryside as designated within the Hart Local Plan 2032 (HLP32) proposals map.

HLP32 Policy SS1 (Spatial Strategy and Distribution of Growth) states that development will be focused within defined settlements, on previously developed land in sustainable locations and on allocated sites. The application site does not fall within the above categories.

Policy NBE1 Development in the Countryside criterion a-n identify forms of development that are potentially acceptable in the countryside. The proposed energy storage facility does not fall within any of these categories.

Whilst the proposed development is within the countryside and does not sit within the general spatial strategy of the development plan a countryside location for this type of development is both necessary and justified. The facility is locationally governed by proximity to the National Grid infrastructure which carries the renewable energy that it is required to store and regulate. It is not possible to require such infrastructure to fit within the locations to which the Local Plan steer the majority of development. The nature and scale of the proposed development would make it difficult to deliver within settlement boundaries.

HLP32 Policy NBE10 supports proposals for the generation of energy from renewable resources, or low carbon energy development provided that any adverse impacts are satisfactorily addressed including individual and cumulative landscape and visual impacts. The criteria at NBE10 (a-f) are relevant. Such applications will also be subject to the following considerations (criteria a-f); the local highway network, ecology, heritage assets, residential amenity; and any wider benefits.

The provision of battery storage that functions as an energy balancing facility is considered to assist socially by maintaining uniform energy provision to households, economically by safeguarding energy supplies and environmentally through improving infrastructure for renewable energy production.

Whilst battery storage is not explicitly included within the scope of Policy NBE10 it may be considered to fall within the definition of low carbon energy development. The technology of battery storage has developed significantly since the Local Plan was written so whereas it was not explicitly mentioned in the policy it is now regarded as an important component of a renewable energy network.

Supporting text (paragraph 307) of the HLP32 states that the delivery of renewable and low carbon energy schemes will contribute towards the mitigation of climate change.

The proposed development would not generate energy but does contribute to reducing emissions by balancing energy supply.

The National Planning Policy Framework (NPPF) defines low carbon technologies as those that can help reduce emissions (compared to conventional use of fossil fuels). It is considered that the proposed development is a contributing form of infrastructure that assists in the transformation to a zero-carbon economy.

Paragraph 157 of the December 2023 NPPF states that the planning system should support renewable and carbon energy and associated infrastructure.

The December 2023 NPPF (paragraph 163) states that, when determining planning applications for low carbon development, local planning authorities should:

" 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 significant cutting greenhouse gas emissions; and

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

The word significant has been added paragraph 163a of the December 2023 NPPF.

Whilst there has been no alternative site considered for the proposed development, the applicant's assert that "there is no better or reasonable alternative location.

It is noted that planning permission (application reference: 19/01186/FUL) was previously proposed for a battery storage facility immediately to the north of the sub-station, that application was withdrawn.

The proximity of the application site, to the north of the National Grid site, is acknowledged and this co-location is an important factor governing the position of the proposed installation.

Furthermore, the submitted visual evidence and a site visit have confirmed the relatively discrete nature of the chosen site in the context of the wider landscape. The Landscape Officer acknowledges that the characteristics of the proposal will have a fundamental effect on the character of the main compound area of the site, which currently is entirely rural. However, due to the low-lying topography in this part of the district, combined with the rural wooded features on all sides, including the proposed soft landscape enhancements, the effects of the industrial character are likely to be contained to the site compound area, with little or negligible impact on the wider landscape beyond. With adequate mitigation, the adverse effects of the proposal could be addressed to minimise the harm to the existing landscape. This is explored further in the relevant section of this report.

Accordingly, it is considered that subject to compliance with any other relevant policies of the Development Plan, the principle of development, that of a renewable energy supporting infrastructure type, is acceptable at this location if its impacts can be made acceptable.

Design and impact on the character of the area

The application is accompanied by a Landscape and Visual Assessment (LVA).

Policy NBE2 of the HLP32 seeks to achieve development proposals that respect and wherever possible enhance the special characteristics, value, or visual amenity of the district's landscapes. It also states that, where appropriate, proposals will be required to include a comprehensive landscaping scheme to ensure that development would successfully integrate with the landscape and surroundings.

The application is accompanied by detailed landscaping proposals which include landscape mitigation comprising of:

- Retention, protection and enhancement of the existing network of woodland, trees and hedgerows within the site, including their protection during construction;
- Provision of a new native hedgerow along to the west of the BESS, following the existing field boundary, to provide additional visual enclosure;
- Provision of native scrub along the southern edge of Cunningham's Row to form understorey planting at the edge of the existing woodland under mature tree canopies;
- Enhancement of areas surrounding the BESS through proposed species rich grassland in line with ecological requirements;
- Provision of a suitable wildflower seed mix tolerant of occasional water submersion within attenuation ponds; and
- Ongoing landscape management of planting during the lifetime of the scheme

Policy NBE2 of the HLP32 contains five criteria to assess development proposals in relation to landscape impacts:

a) *impacts to landscape qualities identified in landscape character assessments.*

b) *the visual amenity and scenic quality of the landscape.*

The site is within the eastern part of Landscape Character Area 2C Loddon Valley and Forest of Eversley West of the Hampshire Landscape Character Assessment (2012). The site further lies within Landscape Character Type of Lowland Mosaic Medium Scale. Within the Hart District Landscape Assessment (1997), the site lies within Landscape Character Area 10: Dogmersfield. The site further lies within Hart District Landscape Type PW1 Mixed Farmland and Woodland: large-scale.

Landscape character areas are included within the appendices of the CVNP. The eastern part of the site area is located within the western compartment, and more specifically Character Area 6: Ormersfield Farm.

The landscape in this part of the district is open medium to large scale in parts, such as the large arable field west of Crookham Village, mixed with low lying small to medium scale blocks of woodland, small copses, sometimes linear and well-treed hedgerows.

The proposed main compound would be visually contained by several of these rural landscape features. South of the site is Swing Bridge Copse (part of Coxmoor Wood SINC-ASNW) which is a broad, dense area of woodland on the northern side of the Basingstoke Canal. North of the site is a broad curvy linear copse of trees and to the east too, broad well-treed hedgerows, one either side of the River Hart.

The LVA concludes that “Overall, the total extent of the landscape and visual effects would be highly localised and limited in nature.” The LVA considers the key views contained within the Neighbourhood Plan and identifies an extremely limited zone of theoretical visibility given the topography and surrounding established vegetation of Cunninghams Row and Coxmoor Wood. Only very limited views of the western extent of the Site are visible as a glimpsed and distant view to users of PRoW 066/1/4, from all other locations the Site is not visible. A landscaping scheme is prepared to include new hedgerow to the west of the Site providing additional screening. During the course of the application, this has been updated to take account of the consultation response from the Environment Agency.

c) impacts to historic landscapes, parks, gardens and features.

The main heritage aspects are considered below as part of the main assessment under planning consideration ‘Heritage Assets’.

d) important local, natural and historic features such as trees, woodlands, hedgerows, water features e.g., rivers and other landscape features and their function as ecological networks.

The application is accompanied by information in respect of trees including ancient woodland/ There is further consideration below as part of the main assessment under planning consideration 'Biodiversity'.

e) It does not lead to the physical or visual coalescence of settlements, or damage their separate identity, either individually or cumulatively with other existing or proposed development.

The proposal would not lead to any physical or visual coalescence between settlements.

Due to the low-lying topography in this part of the district, combined with the rural wooded features on all sides, including the proposed soft landscape enhancements, the effects of the industrial character are likely to be contained to the site compound area, with little or negligible impact on the landscape beyond. In this regard the proposals accord with HLP32 Policy NBE2, as they are able to integrate with the landscape and surroundings.

The LVA concludes that the due to the substantial visual containment and enclosure provided by the surrounding woodland, trees and hedgerows, the effects upon local landscape character and surrounding visual receptors are highly limited. Public views of the Site are limited to those parts of the scheme where development is only temporarily visible during construction (i.e. the cable grid corridor in close proximity to Basingstoke Canal), at ground level (i.e. the access track nearest to Crondall Road). The battery storage facility itself being out of public view given the landform and the extensive woodland screening of this part of the site.

Heritage Impacts

Section 66 of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that in considering whether to grant planning permission for development which affects a Listed Building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that with respect to any buildings or other land within a conservation area, in the exercise of relevant functions under the planning Acts, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Policy NBE8 of the HLP32 states that development proposals should conserve or enhance heritage assets and their settings, taking account of their significance.

Paragraphs 195, 199, 200, 202 and 203 of the NPPF are of relevance for determining the significance of Heritage Asset (HA), assessing the impact of the significance and the need to weigh heritage harm.

The Environmental Statement includes consideration of the effects the proposed development may have on archaeology and designated and non-designated heritage assets. These include surrounding Listed Buildings:

> Strangers Corner, Crondall Road, grade II, Strangers Corner, Crookham Village
>
> Brook Cottage, Crondall Road, grade II Brook Cottage, Crookham Village
>
> Granary at Ormersfield Farm, grade II, Dogmersfield
>
> Ormersfield Farm Barn (B), grade II, Dogmersfield
>
> There are a number of Listed Buildings (1 x Grade I (Dogmersfield Park House) and 8 x Grade II) within and adjoining the Grade II Dogmersfield Park Registered Park and Garden approximately 650 m east. The Grade I Dogmersfield Park House Listed Building lies approximately 1.1 km west.
>
> Canal Cottage, Bridge House and The George and Lobster, Crondall Road, Crookham - Locally Listed

Conservation Areas:

The majority of the site lies to the north of the Basingstoke Canal Conservation Area; however, it is noted that the proposed cable would run under the Basingstoke Canal, which forms the Conservation Area. The site lies to the south of the Crookham Village Conservation Area

The Basingstoke Canal was one of the earliest canals to be built and is an important element of the early industrialisation of the country, and a fine example of the engineering and construction technology of the time. The canal, therefore, has architectural and historic interest in terms of the definition of significance contained within the NPPF.

The principal concern regarding this proposal is the construction of the access road adjacent to the canal and the installation of an underground cable that would require drilling under the canal and works to the area around the canal during construction.

The proposed access road would mostly replace an existing informal route, the formalisation of the route would cause a level of harm to the setting of the conservation area, however, views out from the canal are limited by the adjacent existing vegetation. The construction works would cause a higher level of harm, but this would be temporary in nature. It is concluded that the proposed works would not cause any harm to the setting of the Crookham Village Conservation Area or that of the listed buildings noted above. The Conservation Officer requests details of the works within the Basingstoke Canal Conservation Area to run the cable between the two sites will be required to ensure that the canal, tow path and embankments are not damaged, or if this does occur are suitably reinstated. Details can be found on the Tree Protection Plan.

The proposed development would cause a low level of less than substantial harm to the Basingstoke Canal Conservation Area and its setting, as per paragraph 208 of the December 2023 the public benefit of the scheme would need to outweigh the harm caused. The public benefits of the scheme are outlined below.

The Council's Conservation Officer concludes that the proposal will cause a low level of harm to the conservation area and its setting, and should the proposal be acceptable in planning terms, then conditions to protect the conservation area during and after the completion of the works should be considered.

Archaeology:

The County Archaeologist has raised no objection subject to a watching brief condition. We concur that there will be no material harm subject to appropriate monitoring during the works.

Overall, the proposed development is likely to cause some harm at the less than substantial scale of harm. Due to the less than substantial harm to heritage assets at the lower level of the spectrum, the proposal would generate conflict with policies NBE8 and NBE9 of the HLP32 or Policy GEN1 of the HLP06 in this respect. The NPPF sets out that heritage harm can in some instances be outweighed by public benefits within the balancing exercise and this assessment is undertaken later in this report in the Planning Balance Section below.

Impacts on Amenity

HLP32 Policy NBE11 requires that development does not give rise to unacceptable levels of pollution; and that it is satisfactorily demonstrated that any adverse impacts of pollution will be adequately mitigated or otherwise minimised to an acceptable level.

HLP06 Saved Policy GEN1 (criteria ii and iii) requires that development avoids a material loss of amenity to residents in respect of noise, disturbance, noxious fumes, dust, pollution, traffic generation, loss of privacy, overlooking or the creation of shared facilities.

The December 2023 NPPF (paragraph 135) seeks a high standard of amenity for existing and future users. Paragraph 191 of the December 2023 NPPF requires planning decisions take into account likely effects of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site or the wide impacts that could arise from the development. In doing so they should take account of noise, identify and protect tranquil areas and limit the impact of light pollution.

The application is supported by a Noise Impact Assessment, which includes a background noise survey and concludes that the proposed development can be operated with a sound output which does not exceed the measured background noise at any residential property. The nearest noise sensitive receptors would experience 'No Observed Adverse Effect Level' as defined in the Planning Practice Guidance. No additional noise mitigation is required to be included to reduce noise levels.

The energy storage process does not inherently have any sound emissions associated with it, however, to ensure the batteries remain at the correct temperature, a series of cooling fans are used. Similarly, the inverter stations used to transform the energy from DC to AC and vice versa can generate noise. Batteries can be charged/discharged over short periods of time with systems operating at full duty. Inversely, they can be charged/discharged over longer periods of time by operating at lower duty. The rest of the time, the systems are on a stand-by mode with fans not operating. Therefore, battery storage developments do not operate continuously at full duty during long periods of time. In addition, cooling fans tend to operate at reduced speed during the night-time when the environmental temperature is lower.

During construction, external lighting would comprise lighting of doorways of the welfare cabins and other temporary buildings, within the temporary construction site compound, to be externally illuminated utilising PIR sensor lighting activated by pedestrian movement approaching/leaving buildings. Such lighting would be appropriately shielded/cowls fitted to prevent light spill away from the doorways.

During the operational period lighting is required to be affixed to the high voltage buildings, such lighting would only be used on rare occasions when the site is to be attended at times of insufficient natural light or in cases of emergency where out of hours work is essential. It is recommended that full details of the external lighting be secured via condition.

In respect of noise impacts and other impacts from the proposed development, the Council's Environmental Health Officer (EHO) concludes that the proposal would be acceptable subject to conditions.

Views of the proposed development from residential properties would be minimal and would not justify a reason for refusal in respect of residential amenity.

No concerns or objections in relation to dust, fumes or fire risk have been raised by the EHO in respect of this application. There would be some temporary impact from construction activity including heavy goods vehicle movements but it is considered that these can be mitigated by appropriate conditions including a Construction Management Plan.

Fire Risk

In August 2023 the PPG section on renewable and low carbon energy was updated. This includes an encouragement to engage with the relevant local fire and rescue service and to consider the guidance produced by the National Fire Chiefs Council.

Fire risk is a material consideration to this planning application. Fire risk is a determining factor in prior approval submissions within the General Permitted Development Order and planning appeals have also confirmed that access for fire safety vehicles is material to the assessment of planning applications. As a result, fire risk is material to this application and Building Regulations would not be applicable to the development as it does not relate to a building.

During the course of the application, a Site-Specific Risk Engagement document has been submitted which details engagement with the Fire Rescue Service. The document acknowledges that it would form the basis of a Detailed Battery Safety Management Plan, which would be secured condition.

The facility would be connected to a 24-hour control room where real-time updates are provided advising of all installed battery faults, heat, smoke or fire alarms status and activation. The control room also has access to the CCTV feeds. The control room has access to emergency overrides and immediate shut down protocols.

Safety systems, include automatic shut off and monitoring of battery units are built into the BESS which are designed to the same electrical safety standards as other high voltage electrical equipment. The detailed design approach will include procuring components and using construction techniques which comply with all relevant legislation applicable and using automatic fire detection and suppression systems during operation within the battery storage facility. Early warning and shut off systems are employed. The monitoring and detection systems check temperate, fire, smoke, gas build up and electrical performance frequently. Battery storage facility containers will automatically partially or fully shutdown to mitigate against the risk of thermal runaway and fire, automatically disconnecting, if any unusual parameters are measured. Multiple types of monitoring and detection systems and electrical isolations are typically deployed within battery storage units to provide for multiple layers of redundancy in the design. There are multiple layers of hardware and software fail safes.

Hampshire Fire & Rescue have been consulted on the application and highlight that there is still insufficient information but acknowledge that most of the information could be secured by condition. However, this would not respond to the distance between the units.

The Applicant has responded:

Fire water containment: The detailed design of the drainage system would allow for fire water and the containment of any contamination arising in the event of a fire at the application site to which the Fire Service would attend and apply water. The area of aggregate hardstanding surrounding the battery storage facility is typically lined with an impermeable barrier to capture and store contaminated fire water within the compound footprint and be sealable at a point(s) prior to the two proposed attenuation basins and perforated pipes should the need arise to contain fire water and/or contamination (a sealable drainage system). Contained firewater can be stored and tankered off site, thereby removing the risk of pollution.

Spacing: The National Fire Chiefs Council guidance is clear that 6 metre spacing is not a “rule”. Suitable design features can be introduced to reduce spacing and the NFCC guidance does not seek to provide full specification or opinion on the entirety of a BESS system design, it is also explicit that every BESS installation will be different. The submitted Site Specific Risk Engagement Document (SSRED) (December 2023) provides an outline of an evidence-based case for the reduction in spacing which will be further detailed within a detailed battery safety management plan, which could be agreed by condition. The spacing of battery containers is dependent on a number of

factors including battery chemical, safety and management systems (including the detection systems, suppression systems and ventilation systems) and properties of the final scheme. A condition is recommended to require details of mechanisms for the maintenance of electrical elements together with an overarching fire safety precaution statemen for the proposed development. A condition on surface water drainage is also recommended and this would include the management of fire water.

Highway Safety, Access and Parking

Policy INF3 of the HLP32 states that development should promote the use of sustainable transport modes prioritising walking and cycling, improving accessibility to services and support the transition to a low carbon future.

Saved policy GEN1 of the HLP06 supports developments that do not give rise to traffic flows on the surrounding road networks which would cause material detriment to the amenities of nearby properties and settlements or to highway safety.

Paragraph 115 of the December 2023 NPPF advises that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The application is accompanied by a Outline Construction Traffic Management Plan (OCTMP). The Applicants submit that access to the site from the A287 is more suitable from Crondall Road than it is than from Chalky Lane / Church Lane and other routes have been discounted.

The construction period would be 26 weeks (6 months), which would require Heavy Goods Vehicle (HGV) movements. The number of HGVs expected are 366 deliveries (732 two-way movements), on average this is less than three HGV deliveries per day (6 two-way movements) are required. Access is proposed to be taken from the double width gate forming the agricultural access where banksmen would be located to aid HGV movements. The proposals including alterations to the access to accommodate a 16.5 metre articulated vehicle (the largest vehicle that would visit the site).

Crondall Road is subject to a weight restriction for environmental reasons rather than the structural condition of Chequers Bridge.

A maximum of 30 construction workers are anticipated.

Once operational the development would require maintenance vehicles (likely to be a transit style van) which would access the site via the access used by HGVs on Crondall Road. Maintenance vehicles would visit the site approximately once or twice a month.

In terms of impacts arising from the development to the operation of the highway network the Local Highway Authority (LHA) has assessed the proposal and has raised no objection but requested an updated drawing to show an additional passing place, close to Crondell Road. This has been requested.

The NPPF is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. No such adverse impacts have been identified. The proposal therefore complies with HLP32 Policy INF3, HLP06 Saved Policy GEN1 and the NPPF in relation to transport and highways.

Flood Risk and Drainage

Policy NBE5 of the HLP32 sets out five criteria when development would be permitted, in this case the applicable criteria are:

- Over its lifetime it would not increase the risk of flooding elsewhere and will be safe from flooding;
- If located within an area at risk from any source of flooding, now and in the future, it is supported by a site-specific flood risk assessment and complies fully with national policy including the sequential and exceptions tests where necessary;
- Within Causal Areas (as defined in the SFRA) all development takes opportunities to reduce the causes and impacts of flooding.

The EA flood mapping shows that the site is largely located within Flood Zone 1, approximately a 100-metre section of the access track between the unnamed watercourse and Itchel Brook forms Flood Zone 2 and 3 at risk of pluvial flooding. The Applicant advises that the Environment Agency advise the site is within a secondary aquifer.The Itchel Brook is a main river.

The application is accompanied by a Flood Risk Assessment (an appendix to the Environmental Statement) and is considered within the main body of the Environmental Statement and there is a separate Water Framework Directive (WFD) Compliance Assessment.

During the course of the application further information on drainage including a drainage strategy, basin calculations and exceedance flow information have been provided.

The drainage scheme comprises of two attenuation basins with outfalls connecting to the unnamed watercourse (east) and a nearby drainage ditch (west), providing for attenuation which mitigates for which the limited impermeable area (0.114 ha) created to runoff and discharge at existing greenfield rates. This ensures that no part of the site becomes a risk of flooding or increases the risk of flooding elsewhere. The impermeable area is restricted to the foundations of the battery containers and associated equipment footprints. Permeable aggregate will be laid between the plant and equipment forming the battery energy storage system and as part of the internal access track from Crondall Road.

Accordingly, the proposed development would not increase the risk of flooding as required by HLP32 Policy NBE5 and NPPF.

The access to the site in the area around the watercourses within flood zones 2 and 3, it is recommended that an Emergency flood plan is secured via condition to limit the number of people on site during a flood event.

Ecology

With regards to biodiversity, policy NBE4 of the HLP32 states that: 'In order to conserve and enhance biodiversity, new development will be permitted provided:

a) It will not have an adverse effect on the integrity of an international, national, or locally designated sites.

b) It does not result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;

c) Opportunities to protect and enhance biodiversity and contribute to wildlife and habitat connectivity are taken where possible, including the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. All development proposals will be expected to avoid negative impacts on existing biodiversity and provide a net gain where possible'.

The application is accompanied by a Water Framework Directive (WFD) Compliance Assessment which aims to determine the effects of the proposal on ecological/biological quality and hydrogeomorphology, identifying any potential impacts that could cause deterioration in the status of a waterbody or could hinder the waterbody from meeting its WFD objectives.

Further information is contained within the Environmental Statement and the supporting Outline Construction Environmental Management Plan (OCEMP) details a number of measures, which would be finalised within a final Construction Environmental Management Plan.

The baseline ecological conditions have been provided including the designated site for nature conservation, (the Basingstoke Canal SSSI, Coxmoor Wood SINC, Ancient Woodland and Itchel Brook) existing habitats and vegetation and species. Mitigation is proposed including landscaping and biodiversity enhancements and Biodiversity Management Plan.

The OECMP outlines the construction approach and phasing, it is acknowledged that the specific works order and sequencing would be developed further by an appointed contractor. The document contains indicative information of a temporary site compound, the compound is shown on the proposed site layout (50 metres by 75 metres). The report identifies secondary smaller compounds along the cable route but details of these have not been provided and would include the launch or receiving pits associated with the directional drilling works on the cable route although there is some information on the Tree Protection Plan.

A river condition assessment and biodiversity net gain assessment have been undertaken. The proposals have been included to increase natural physical features within the channel through the placement of large woody debris, non-native invasive planting being eradicated along this part of the Itchel Brook and a reduction in the encroachment within riparian zone through the elimination of agricultural practices (arable and grazing) within 10 metres of the bank top. Furthermore, no other artificial cover would be created within 10 metres of the bank top, including but not limited to transport infrastructure, for at least 30 years following completion of the proposed development and a reduction in shading on the Itchel Brook will be achieved through the management of low-lying scrub and tall herbs/grasses on the bank face and bank tops of the brook.

The Proposed Development is anticipated to result in a net gain of 0.03 (2.10%) river units. Although a 10% net gain of river units is not achieved, a measurable gain in river units is achieved, which is in line with the NPPF. Furthermore, a measurable gain in the preliminary condition score within the Cartographer platform (0.996 baseline to 1.227 post-development scenario) is also achieved. The planning application was submitted prior to the implementation of the requirement for Biodiversity Net Gain to be mandatory.

In order to achieve a 10% gain in river units, additional measures such as the planting of additional trees and shrubs within 10m of the bank top and re-profiling of the bank face to diversify the bank face profile would need to be undertaken to enhance the watercourse to ‘fairly good’ condition. However, these measures are concluded to be inappropriate for this length of brook and are not considered to be of sound ecological practice as additional shading of the brook would be detrimental to the bank face and aquatic vegetation and therefore associated species. Reprofiling the brook would likely result in sedimentation and disturbance to terrestrial and aquatic species, which are considered disproportionately harmful given the modest length of brook subject to enhancement measures.

The submitted information has been reviewed by the Council’s Ecologist who raises no objection subject to conditions. During the course of the application, there have been discussions with the EA regarding ecological enhancements, including a condition requiring the submission of a landscape and ecological management plan.

Trees

Saved policy CON8 of the HLP06 states that where development is proposed which would affect trees, woodlands or hedgerows of significant landscape or amenity value planning permission will only be granted if these features are shown to be capable of being retained in the longer term or if removal is necessary new planting is undertaken to maintain the value of these features. Planning conditions may be imposed to require the planting of new trees or hedgerows to replace those lost.

The Application is accompanied by an Arboricultural Impact Assessment (AIA), which has been updated to provide clarification during the course of the application.

No vegetation (including ancient woodland) is required to be removed in order to facilitate the proposed development. Some cutting back of hedgerow vegetation at the existing agricultural access off Crondall Road, may be required to ensure suitable visibility splays are provided.

The AIA sets out that forming an arboricultural watching brief and temporary construction fencing, alongside the construction methodologies detailed within the Outline Construction Environmental Management Plan (i.e. use of horizontal directional drilling) would prevent adverse impacts on existing vegetation, including on Coxmoor Wood ancient semi-natural woodland and mature trees near the banks of the unnamed watercourse crossing where a replacement bridge is to be installed.

The application site runs through an Ancient Woodland. Natural England and the Forestry Commission's Standing Advice provides a recommended buffer of at least 15m+ between ancient woodland and a development. The red line is within 15 metres of the ancient woodland.

The application has been reviewed by the Council's Tree Officer who raises no objection subject to conditions.

The proposed development would not require the removal of (or part of) any trees, tree groups, woodlands or hedgerows, however some, very limited, cutting back of hedgerow vegetation at the existing agricultural access off Crondall Road, may be required to ensure suitable visibility splays are provided.
As such, there is no objection to the proposal in tree terms and subject to planning conditions would comply with saved policy CON8 of the HLP06, Policies and the aims of the NPPF in this regard.

Thames Basin Heaths Special Protection Area (TBH SPA)

The site lies within 5km of the TBH SPA, given the nature of the proposed development the proposal is not considered to have any adverse impact on the TBH SPA.

Climate Change

On 29th April 2021 Hart District Council agreed a motion which declared a Climate Emergency in the District.

In January this year Cabinet determined that significant weight will be given to the Council's declaration of a Climate Emergency in all planning decisions.

Policy NBE9 of the HLP32 requires proposals to demonstrate that they would:

> i) reduce energy consumption through sustainable approaches to building design and layout, such as through the use of low-impact materials and high energy efficiency; and
>
> j) incorporate renewable or low carbon energy technologies, where appropriate.

The submitted application proposes an energy storage facility which will provide capacity for energy to be stored during periods of generation surplus, where it would be released during generation shortages. This energy would be stored on site and would ultimately be exported to the National Grid.

The proposal therefore meets the requirements of Policy NBE9 of the HLP32, and the aims of the NPPF in terms of sustainability/renewable or low-carbon energy technologies to address climate change.

Equality

The Council has a duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics and those who do not under the Equalities Act. The application raises no concerns about equality matters.

Other planning considerations

- Loss of agricultural land

Paragraph 174 of the NPPF requires, among other requirements, that planning decisions should contribute to enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

According to the Council's mapping the land where the battery storage compound would be located grade 4 'poor' land. In this respect the site does not contain soil in the top two grades of agricultural land. The limited conflict with the NPPF in this regard would be regarded immaterial in this respect.

Planning Balance

Section 70(2) of the Town and Country Planning Act 1990 ("TCPA 1990") provides that the decision-maker shall have regard to the provisions of the development plan, so far as material to the application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

The proposal is intended to provide storage to balance out the variations in peaks from energy produced from renewable sources; This would ensure that energy production and supply can be balanced out, thereby helping provision. Also, by being efficient in having energy available from renewable sources when needed; it would provide a significant energy saving.

It is important to note the public benefits which would arise from this proposal, and these are as follows:

- Social benefits would arise in that the proposed energy storage facility would facilitate the availability of renewable energy through electricity network by providing extra storage capacity to cover periods when sun or wind are not so strong. The proposal would assist in maintaining uniform energy provision. This would enable some reduction in the energy burden in line with the government's aims and the December 2023 NPPF (paras. 8c and 157) for a low carbon economy, as also supported by HLP32 Policy NBE10.

- Economic benefits attracted by the proposal would be employment and local expenditure during the construction of the development and, to a limited extent, during the operational stage. The proposal would assist in safeguarding energy supplies, provide additional grid capacity and the ability to provide energy in periods of high demand.

- Environmental benefits arising from the proposal would include improving the infrastructure for renewable energy production.

Benefits increasing renewable energy generation

The disbenefits and harm identified above are:

- The impact on the landscape quality of the immediate surroundings which, whilst material, would be limited to the immediate environment of the field and would have little or no impact on the wider landscape character.

- The proposal would result in the loss of some agricultural land but this is of a low quality.

- Less than substantial harm to the setting of the Basingstoke Canal Conservation Area. This is considered to be outweighed by the public benefit of the proposal in terms of mitigation of climate change.

- Some temporary adverse impact on residential amenities arising from vehicle movements during the construction period. The impact will be relatively short-lived and can be mitigated by a Construction Management Plan

Overall, considering the benefits stated above, the weight given to the Council's declaration of a Climate Emergency and the potential to mitigate harm by appropriate conditions, the proposal would deliver public benefits on a scale which would outweigh the limited harm identified.

CONCLUSION

The application has been assessed against the development plan and relevant material considerations as identified in this report and it has been concluded that the overall planning balance weighs in favour of approval. The benefits identified and supported by the NPPF outweigh the limited conflict with the development plan, of which the impacts can be adequately mitigated.

As such this application is recommended for approval subject to conditions.

RECOMMENDATION – **GRANT** subject to planning conditions.

CONDITIONS

Time Limit

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

   Reason: In pursuance of section 91 of the Town and Country Planning Act 1990 (as amended) by section 51 of the Planning and Compulsory Purchase Act 2004).

Approved Drawings

2. The development hereby permitted shall be implemented fully in accordance with the following submitted application plans, drawings and reports listed below (including any mitigation / enhancement recommended therein):

   Access Road (FT-01-P04)
   Auxiliary Transformer (FT-01-P07)
   Battery Container Elevations (FT-01-P09)
   Battery fence and gate elevations (FT-01-P10)
   Block Plan (FT-01-P17 Sheets 1-4)
   Bridge elevations (FT-01-P14)
   CCTV Elevations (FT-01-P08)
   Control Room (FT-01-P06)

   Inverter (FT-01-P03)
   Landscape Visual Assessment
   Noise Impact Assessment
   Planning Statement
   Site access arrangement with visibility splays and vehicle tracking (2205-019 SK01) No revision
   Site Location Plan (FT-01-P01 Rev 03)
   Switch room (FT-01-P05)
   Topographical Survey (A003)
   Water Framework Directive Compliance Assessment
   (all of the above received by the Local Planning Authority on 5th April 2023)

   Exceedance Flow Plans Sheets 1 and 2 (22841-RAP-XX-XX-DR-D-3102 Rev P01 and 22841-RAP-XX-XX-DR-D-3103)
   Drainage Strategy Sheets 1 and 2 (22841-RAP-XX-XX-DR-D-3100 P03 and 22841-RAP-XX-XX-DR-D-3101 P03)
   Basin A calculations (9 pages)
   Basin B calculations (9 pages)

(received by the Local Planning Authority on 27th April 2023)

Proposed Site Plan (FT-01-P02 Rev 04)
Water Tank (FT-01-P19)
Site Specific Engagement Document
(received by the Local Planning Authority on 8th December 2023)

River Condition Assessment Technical Note and Biodiversity Net Gain (BNG) Assessment including Annex 1 and 2.

Arboricultural Impact Assessment
(received by the Local Planning Authority on 29th February 2024)

Reason: For the avoidance of doubt and in the interests of proper planning to ensure that the development is carried out in accordance with the application form and associated details hereby approved.

Archaeological Written Scheme of Investigation

3. No development shall commence until a programme of archaeological work detailed within a Written Scheme of Investigation has been submitted to and approved in writing by the local planning authority. Once approved, the development shall take place in accordance with the approved details.

Reason: The site is identified as being of archaeological potential. Investigation is required to allow preservation and recording of any archaeological features before disturbance by the development in line with Policy NBE8 of the Hart Local Plan (Strategy and Sites) 2032 and Section 16 of the National Planning Policy Framework 2023.

Construction Environmental Management Plan

4. No development shall commence until Construction Environmental Management Plan detailing the site-specific measures to be undertaken to mitigate impact on protected sites and species on site has been submitted to, and approved in writing by, the Local Planning Authority. The Plan shall include measures to be undertaken during construction to minimise impact on Basingstoke Canal SSSI and protected species. The works shall take place in accordance with the approved Construction Environmental Management Plan. Reason: To prevent harm to protected sites and protected species in accordance with policy NBE4 of the Hart Local Plan (Strategy and Sites) 2032, saved Local Plan Policy GEN1 of the Hart District Local Plan 1996-2006 and aims of the NPPF 2023.

Construction Hours

5. No construction or demolition activity shall be carried out and no construction related deliveries shall occur, taken at or dispatched from the site except between the hours of 7:30 hours and 18:00 hours on Monday to Friday and

08:00 hours and 13:00 hours on Saturday except in the case of Bank or Public Holidays when no such activities or deliveries shall take place. No such activities or deliveries shall take place on Sundays.

Reason: To protect residential amenity from noise and disturbance outside the permitted hours during the construction period in accordance with saved Local Plan Policy GEN1 of the Hart District Local Plan 1996-2006.

Construction Management Plan

6. No development shall commence, including use of the existing access, site clearance, demolition or ground works, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall detail practicable measures to mitigate noise, vibration and dust transmission. Measures to include, but not necessarily restricted to:

1. Times of operation. Written approval to be sought from Local Planning Authority to operate outside of specified times.
2. The parking of vehicles for site operatives and visitors.
3. Loading, unloading of plant and materials to/ from site.
4. The erection and maintenance of hoarding to site boundary.
5. Water suppression during dusty activities.
6. Wheel washing facilities.
7. A scheme for the storage and disposal of waste, providing maximum recycling opportunity.
8. Community liaison and notification, including complaints recording and management.
9. Details of site monitoring and logging of results.
10. Details of all other measures to keep noise, vibration and dust to a practicable workable minimum.

Reason: In the interests of highway safety and convenience of highway users, to help manage the ecological and arboricultural impacts and to mitigate any harm to residential amenities in line with Policies INF3, NBE4 and NBE10 of the Hart Local Plan (Strategy and Sites) 2032 and Policy CON8 of the Hart District Local Plan 1996-2006.

Tree Protection details to be submitted.

7. No development including site clearance, demolition, ground preparation, temporary access construction/widening, material storage or construction works shall commence until an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) have been produced, specific to this scheme, and been submitted and approved in writing by the Local Planning Authority. The Tree Protection Plan and Arboricultural Method Statement shall be written in accordance with BS5837:2012 Trees in relation to design, demolition and construction – recommendations. The statement shall detail how trees will be protected through the development until completion and shall include a

schedule for the relevant points that require arboricultural monitoring and supervision.

No development or other operations shall take place other than in complete accordance with the approved details.

Reason: To secure tree protection throughout the lifetime of the development being carried out with trees, scrub or hedges growing within or adjacent to the site which are of amenity value in the area, and to ensure the necessary measures are in place before development commences in accordance with Policy NBE 2 of the Hart Local Plan (Strategy and Sites) 2032 and saved Local Plan Policy CON8 of the Hart District Local Plan 1996-2006.

Site Storage details to be submitted.

8. Prior to the commencement of development, details of all areas to be used for onsite materials storage, construction workers parking, and for ancillary temporary building(s) including any phasing of use such areas, shall be submitted to, and approved in writing by the Local Planning Authority. Nothing shall be stored or placed in any construction exclusion zone and all site storage maintained in accordance with this condition.

Reason: To ensure that the tree(s) are not damaged or adversely affected by any site clearance or building operations in accordance with Policy NBE 2 of the Hart Local Plan (Strategy and Sites) 2032 and saved Local Plan Policy CON8 of the Hart District Local Plan 1996-2006.

Pre-commencement meeting

9. No development including site clearance, demolition, ground preparation, temporary access construction/widening, material storage or construction works shall commence until a pre-commencement meeting between the appointed arboriculturalist, and the site or construction manager has taken place. Attendance must be evidenced and confirmed in writing by the appointed arboriculturalist, including site notes, and ensure that all tree protection measures have been fully implemented and submitted to the Local Planning Authority.

Reason: To ensure that the tree(s) are not damaged or adversely affected by any site clearance or building operations and in accordance with Policy NBE 2 of the Hart Local Plan (Strategy and Sites) 2032 and saved Local Plan Policy CON8 of the Hart District Local Plan 1996-2006

External Lighting

10. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification), no external lighting shall be installed on the site or affixed to any buildings on the site prior to the submission of details to, and approved in writing by, the Local Planning Authority.

Reason: In the interests of amenity and in accordance with saved policy GEN1 of the Hart District Local Plan 1996-2006.

Landscape and Ecological Management Plan

11. Prior to the commencement of development a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas, has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include (not necessarily exclusively) the following elements: details of any new habitat created on-site. This shall include detailed designs that show the number, location and dimensions of the large woody debris proposed. It shall also include the design, length and location of the proposed fencing, as well as further information that outlines the amount and locations of the de-shading proposed. Details must demonstrate that the proposed features and works will not cause increased flood risk. details of the proposed new bridge which shall be clear span. This shall include detailed designs of the bridge that show the location of the bridge footings/foundations in relation to the bank top, as well as any other associated impacts to the river (such as installation of bank protection, for example), and demonstrate that flood risk will not be increased. details of maintenance regimes, which shall include how the presence of invasive non-native species will be eradicated details of treatment of the buffer alongside the Itchel Brook details of management responsibilities.

Details should include management responsibilities and maintenance schedules for all landscaped areas.

Reason: To ensure the protection of wildlife and supporting habitat in accordance with Policy NBE4 of the Hart Local Plan (Strategy and Sites) 2032.

Fire Safety

12. Notwithstanding the details submitted with the application, prior to the first export date, the applicant shall submit details of mechanisms for the maintenance of electrical elements together with an overarching fire safety precaution statement for the development.

Reason: Insufficient details were submitted with the application and are required in order to understand the potential fire safety implications.

Construction Traffic Management Plan

13. Prior to the commencement of development a Construction Traffic Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The subsequent commissioning and de-commissioning of the development shall abide by the terms of the Construction Traffic Management Plan.

Reason: In the interests of highway safety and convenience and to and in accordance with Policy INF3 of Hart Local Plan (Strategy and Sites) 2032.

Visibility Splays

14. Prior to the commencement of development, a visibility splay of 2.4 metres x 43 metres x between 1 metre and 3 metres shall be provided at the access to the site from Crondall Lane.

Reason: In the interests of highway safety and convenience and in accordance with Policy INF3 of Hart Local Plan (Strategy and Sites) 2032.

No gate or obstruction

15. During construction works of the development hereby approved, no gate or other obstruction to the passage of vehicles shall be provided a minimum of 16.5 metres measured from the nearside edge of carriageway of Crondall Lane and from the same position the access shall be surfaced in a non-migratory material for a minimum distance of 30 metres.

Reason: To ensure that vehicles do not obstruct the highway whilst waiting for gates or barriers to be opened or closed, in the interests of road safety and in accordance with Policy INF3 of Hart Local Plan (Strategy and Sites) 2032.

Landscape Plan

16. No development shall take place until details of both hard and soft landscaping works have been submitted to and approved in writing by the local planning authority.

These details shall include:

- earthworks showing proposed finished levels and retaining structures, including foundations
- surface treatments, surface materials including subbase construction details where necessary.
- means of enclosure including foundation details
- a programme for implementation

Soft landscape works shall include:

- Full planting plans
- Written specifications including cultivation and other operations
- An implementation programme including phasing of works where relevant.

All planting and seeding comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the completion of the development, whichever, is sooner: an trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar sized species.

Reason: In the interests of landscape scenic quality of the area in accordance with Policy NBE2 of the Hart Local Plan (Strategy and Sites) 2032, saved Policy GEN1 of the Hart District Local Plan 1996-2006 and the aims of the NPPF 2023.

Restoration

17. Upon removal of the Battery Energy Storage System from the site, the site shall be restored to its condition prior to the development hereby approved being undertaken.

Reason: In the interests of visual amenity and in accordance with Policy NBE2 of the Hart Local Plan (Strategy and Sites) 2032.

Surface Water Drainage Scheme

18. Prior to the commencement of development a surface water drainage scheme, to include details of fire water and chemical contamination containment, shall be submitted to and approved in writing by the Local Planning Authority. The containment must be impermeable to the specific chemicals within the batteries and provide for a sealable drainage system. Such containment, as approved, shall be provided for the duration of the presence of the batteries on site. The development shall be carried out in accordance with the approved details.

Reason: To ensure fire safety and to protect the local water environment to comply with Policy NBE11 of the Hart Local Plan (Strategy and Sites) 2032.

Emergency Flood Plan

19. The development hereby approved shall not be brought into operation until a detailed Emergency Flood Plan for the site has been submitted to, and approved in writing by, the Local Planning Authority. The Plan shall include details of:
1) A map of the identified safe access and egress route
2) Any signage that will be provided on site exits clearly identifying which routes should and should not be used in a flood event.
3) Any actions required tominimise the risk to site users
4) Any relevant flood warnings or heavy rainfall alerts.

The approved Plan shall be made available for all site owners and managers and adhered to for the lifetime of the development.

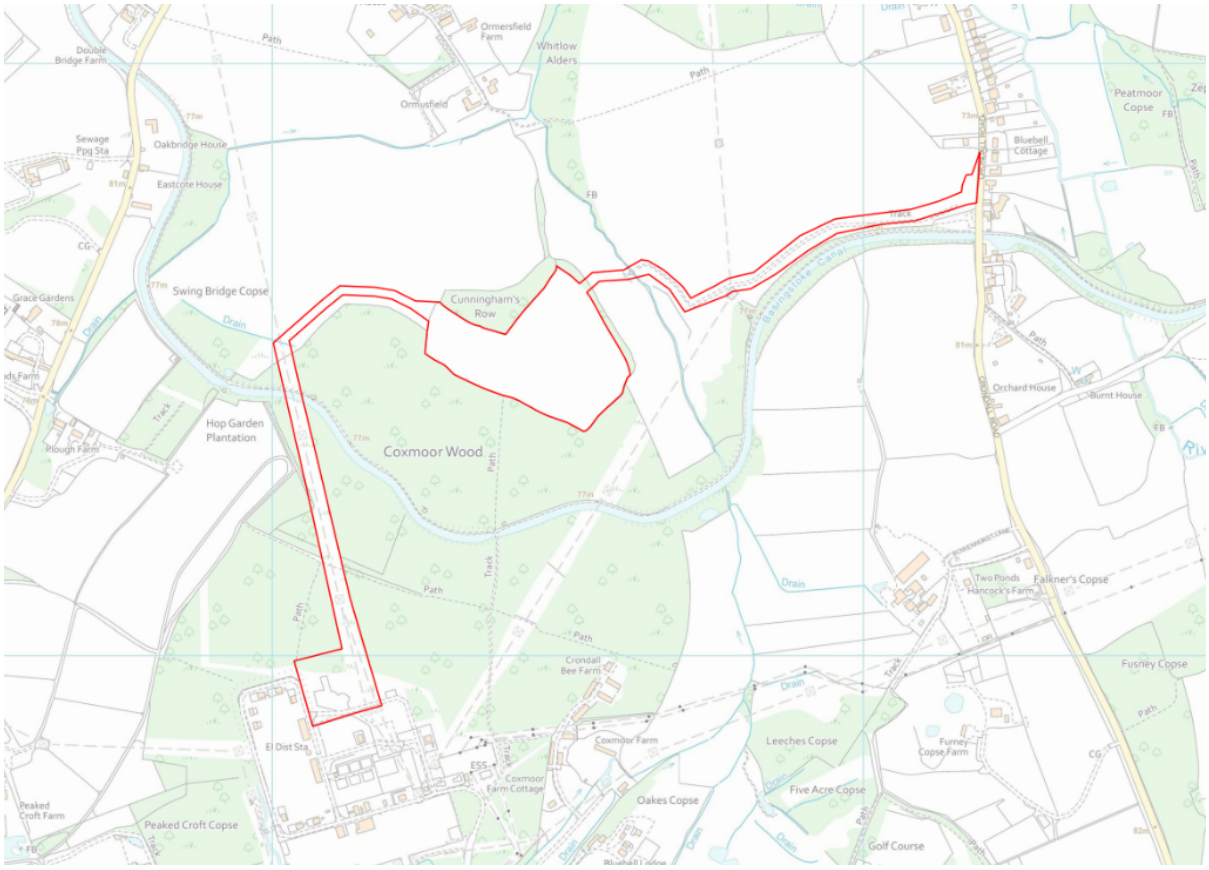
Reason: To manage the number of people on site in the event of a flood and to accord with Policy NBE5 of the Hart Local Plan (Strategy and Sites) 2032.

INFORMATIVES

1. The Council works positively and proactively on development proposals to deliver sustainable development in accordance with the NPPF. In this instance, the applicant was advised of the necessary information needed to process the application and revisions were accepted to address concerns raised, once received, further engagement with the applicant was required and the application was subsequently made acceptable.

2. Before undertaking any work which affects a public highway you must obtain specific written approval from the Director of Universal Services at Hampshire County Council and enter into or secure any necessary legal agreements or consents to enable the works on a public highway to proceed. It is an offence to carry out unauthorised works on a public highway. This requirement applies not only to the creation of new vehicle accesses involving excavation within a footway, verge or carriageway but also to the stopping of existing access(es) or other works on or to the public highway. For further information, please contact roads@hants.gov.uk

Location Plan



Site Plan