

# **Planning Statement**

## Rossendale Battery Energy Storage System (BESS)

Cubico UK Developments Limited

March 25

**Turley**

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Cubico UK Developments Limited  
**Our reference**  
00865

March 25

# Executive Summary

This Planning Statement has been prepared by Turley on behalf of Cubico UK Developments Limited in support of an application for Full Planning Permission for a proposed Battery Energy Storage System (BESS) on land at Rochdale Road and Bamford Road, Turn Village, Rossendale. The description of development is as follows:

*“Construction, management and operation of a Battery Energy Storage System (BESS) with associated infrastructure, including access, drainage, security measures and landscaping and provision of a connecting cable to Croston Close Road substation.”*

The Site covers an area of 6.2 hectares and is located approximately to the west of Ramsbottom, south of Edenfield and south of Bury. The Site is located within the designated Green Belt of Rossendale. Access to the Site is currently provided via two agricultural entrances from the A680 (Rochdale Road). One point of access will be maintained for the Proposed Development.

The Site is located within the Green Belt and the proposals would comprise inappropriate development. There would be definitional harm by reason of inappropriateness and harm to the openness of the Green Belt. The proposal would also cause harm to the Green Belt through encroachment. This harm to the Green Belt attracts significant weight. There would also be harm to landscape character and visual amenity and a low level of less than substantial harm caused in respect of the setting of grade II listed Fecit Farmhouse with attached stable and shippon.

However, there are a range of other important considerations which carry substantial weight and which, in combination, significantly outweigh the identified harm, such that Very Special Circumstances necessary to justify development in the Green Belt exist.

These include the contribution which the Proposed Development would make to realisation of the UK’s national targets for reducing greenhouse gas emissions by supporting the transition to low-carbon energy systems and the absence of alternative sites located outside the Green Belt capable of accommodating the Proposed Development.

Specifically, it seeks to enhance the storage capabilities of clean, renewable energy, thereby enabling more effective integration of intermittent renewable energy sources.

By providing adequate storage infrastructure, the Proposed Development will improve the resilience and reliability of renewable energy generation, ensuring that surplus energy can be stored and utilised when demand is high, or generation capacity is low. This approach aligns with the objectives outlined in national policy and the Planning Practice Guidance (PPG) for the promotion of low-carbon technologies and will help support the broader aim of achieving a sustainable, low-emission energy grid.

That there will be some limited residual effects to the receiving environment is inevitable in all forms of development, but particularly those involving energy infrastructure; an inevitability which is recognised in National Policy Statements for Energy: EN-1, EN-3 and EN-5.

The limited harm which would arise results from the current international, national and local policy imperatives associated with a shift to a net zero economy.

The limited harm would be temporary and entirely reversible upon decommissioning. It is infinitely preferable to the catastrophic effects which climate change would have on the landscape (and views / biodiversity) if the level of greenhouse gas emissions is not abated through projects such as this.

The Proposed Development is considered to be compliant with the objectives and requirements of both the adopted Development Plan and the NPPF. It is also supported by a range of international, national and local legislation, policy and strategy which recognise the importance of BESS to optimising the utilisation of electricity generated from renewable sources.

# 1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of Cubico UK Developments Limited ('the Applicant') to accompany a full planning application for a Battery Energy Storage System (BESS) (the 'Proposed Development') at land adjacent to Rochdale Road and Bamford Road, Turn Village, Rossendale ('the Site').
- 1.2 This statement is intended to assist Rossendale Borough Council ('the Council') as the Local Planning Authority ('LPA') in determining the application, by providing an evaluation of the Proposed Development against relevant planning considerations. Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, this statement considers the conformity of the Proposed Development with the Local Development Plan and the weight to be applied to other material planning considerations.

## **The Applicant**

- 1.3 Cubico UK Developments Limited is a global leader in the renewable energy sector. With a portfolio spanning nine countries, Cubico has a proven track record in financing, developing, and managing renewable energy assets that support the global transition to a low-carbon economy. To date, the company has successfully contributed 2.9GW of installed renewable energy capacity and has a development pipeline of an additional 17GW<sup>1</sup>. Cubico's ongoing commitment to sustainability and clean energy aligns with national and international climate objectives, reinforcing its role as a key player in the renewable energy industry.
- 1.4 It is noted that the Site is strategically located within proximity of the existing Scout Moor Wind Farm (SMWF) which is positioned on open moorland between Edenfield, Rawtenstall and Rochdale. The development comprises 26no. turbines with a total installed capacity of 65MW. SMWF opened in September 2008 and is now operated by Scout Moor Wind Farm Limited, owned by MunichRe ('MEAG').
- 1.5 In November 2024, Cubico announced its intention to investigate the potential to construct another wind farm adjacent to SMWF – to be known as Scout Moor II – comprising up to 21 wind turbines (up to 180m in height) with a generating capacity of up to 100MW, associated infrastructure and access. A preliminary round of public and stakeholder consultation was completed by Cubico in respect of the Scout Moor II proposals in late 2024, and a request for an Environmental Impact Assessment Scoping Opinion is currently pending consideration by the Council and Rochdale Metropolitan Borough Council (RBC ref. 2024/0495 and RMBC ref. 24/01241/SCO).
- 1.6 It is currently anticipated that applications for full planning permission will be submitted to the Council and RMBC – as the boundary spans the administrative boundaries of the two Local Authorities – in May 2025.

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<sup>1</sup> [Cubico UK Developments Limited](#)

## **The Proposed Development**

- 1.7 The description of development is as follows:

*“Construction, management and operation of a Battery Energy Storage System (BESS) with associated infrastructure, including access, drainage, security measures and landscaping and provision of a connecting cable to Croston Close Road substation.”*

- 1.8 The Proposed Development comprises a series of battery containers and associated equipment including inverters, transformers, control room and storage container. The Site will also have its own on-site substation which will facilitate the connection onto the grid situated 0.5km to the south of the site at Croston Close Road.
- 1.9 The batteries will be housed within secure containers which will be no more than 3 metres in height and all equipment will be enclosed by a boundary fence. The Proposed Development will have an installed capacity of up to 85MW and will supply electricity to the National Grid during times of peak energy demand, supporting other low-carbon and renewable projects, aimed to help ensure the UK meets its Net Zero targets.
- 1.10 BESS technology is rapidly evolving, and consent applications are often submitted before equipment procurement begins. To allow developers flexibility in selecting the most appropriate equipment based on technical, commercial, and market factors during the procurement phase, planning applications typically utilise the 'Rochdale Envelope' approach whereby a range of development parameters are defined which allows the decision maker to understand the reasonable worst-case scenario and associated potential environmental impacts. This method is widely employed in applications under the Town and Country Planning Act 1990, the Planning Act 2008, and the Electricity Act 1989.
- 1.11 Full planning permission is sought for the Proposed Development for a temporary period of 40 years, at which point the Site will be capable of being reinstated to its present-day condition.

## **Context and Need for Development**

- 1.12 The UK Government has a legal obligation to achieve at least a 100% reduction in greenhouse gas emissions, compared to 1990 levels, by 2050 (“net zero”). The pathway to net zero includes an interim target of a 78% reduction in greenhouse gas emissions (compared to 1990 levels) by 2035.
- 1.13 The National Planning Policy Framework (NPPF) confirms that the provision of low carbon energy is central to the economic, social and environmental dimensions of sustainable development. It is also critical to the realisation of climate change objectives. The provision of greater levels of renewable and local carbon energy infrastructure is, however, required to be supported by facilities for energy storage.
- 1.14 The Government’s Clean Power 2030 Action Plan, the National Energy System Operator’s Clean Power 2030 report, the National Policy Statement EN1 and a range of other Governmental and industry-led publications articulate the need for and provide

strong support for the development of battery storage facilities. NPS EN1 confirms that the Government has concluded that there is a Critical National Priority for the provision of nationally significant low carbon infrastructure.

- 1.15 The Smart Systems and Flexibility Plan identifies that in order to achieve the deep power sector decarbonisation needed to achieve the Sixth Carbon Budget, significantly higher levels of system flexibility (such as BESS) will be needed as renewable power replaces fossil fuels and heat and transportation is electrified: around 30GW of low carbon flexible capacity may be needed by 2030 and 60GW by 2050 in order to maintain energy security and cost-effectively integrate high levels of renewable energy generation.
- 1.16 Many of the storage facilities currently deployed provide storage over a period of hours. Consequently, storage capacity needs to increase to at least 30GW by 2030, in order to meet the Government's stated objectives regarding "net-zero" and the associated legal obligations.
- 1.17 This importance of and need for battery storage facilities to meeting net-zero obligations and facilitating the increased use of renewable energy resources has also been recognised in a number of recent appeal decisions, whereupon considerations of need have been awarded very significant weight in the planning balance.
- 1.18 Battery storage facilities are thus an essential component in meeting climate change objectives, reducing the costs of electricity and in increasing levels of national energy security.
- 1.19 By absorbing extra energy, storing it, and releasing it onto the network when the grid needs it during periods of peak demand, the construction of battery storage facilities enables the local grid network to run more effectively. When there is insufficient power during periods of high demand, batteries are discharged to balance under frequency preventing black and brown outs.
- 1.20 To balance over frequency, the batteries are charged to prevent dangerous spikes across the electricity infrastructure. This is crucial given the potential of short- to medium-term gas shortages, which might interfere with residential electrical supply.
- 1.21 Battery storage facilities therefore provide a valuable service to both the National and Local Distribution Grid. Battery storage facilities also play a fundamental role in decentralising the grid system, enabling power to be generated and stored in specific localised areas where it is required. Increasing the amount of operational storage developments reduces the over-dependence on centralised, fossil-fuel facilities, which in turn has a cumulative effect on reducing CO2 emissions and de-carbonising the grid. Decentralisation is key in increasing efficient energy generation, with less reliance on centralised facilities to overproduce in operation to account for transmission loss over greater distances.
- 1.22 Battery storage schemes also allow more renewable energy production to be integrated into the system. As renewables produce a variable supply of electricity production in peaks and troughs, battery storage facilities allow for this, being able to

respond at short notice to requests from National Grid to generate electricity, when renewable sources are not generating.

### **Stakeholder Engagement**

- 1.23 The consultation for the Proposed Development was held between the 5<sup>th</sup> to 26<sup>th</sup> November 2024. The consultation process involved seeking feedback from the local community and political stakeholders on the proposals.
- 1.24 Various methods were used to ensure the consultation process was accessible to all interested parties and groups in the area including letters to local political stakeholders, a dedicated website, dedicated email and postal addresses, community information line, leaflets distributed to residents and businesses and webinar.
- 1.25 The consultation feedback is detailed and addressed further in the Statement of Community Involvement report by Lexington.

### **Environmental Impact Assessment**

- 1.26 Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the 'EIA Regulations') identifies projects where an EIA is required. The EIA Regulations implement the requirements of the European Community's Directive on Environmental Assessment (85/337/EEC), as amended by the Council Directive No. 97/11/EC and 2011/92/EU. Further guidance is provided in the National Planning Practice Guidance (PPG).
- 1.27 An EIA Screening Report was submitted on 6<sup>th</sup> January 2025, and Rossendale Borough Council subsequently confirmed that the proposals do not comprise EIA development through their Screening Opinion issued on 26<sup>th</sup> February 2025 (Ref. 2025/0002).

### **Statement Structure**

- 1.28 The remainder of this report is structured as follows:
- **Section 2** – provides an overview of the application site and its geographical context.
  - **Section 3** – presents details of the Proposed Development.
  - **Section 4** – provides a summary of the development plan and applicable national planning policies that should be used to assess the development proposals.
  - **Section 5** – provides an assessment of the extent and level of harm that the Proposed Development would cause to the Green Belt.
  - **Section 6** – provides a comprehensive evaluation of the harm to the Green Belt and other impacts resulting from the Proposed Development alongside setting out the Very Special Circumstances.

- **Section 7** – provides an evaluation of the Proposed Development in relation to key environmental and technical considerations.
- **Section 8** - provides a concluding chapter and the overall Planning Balance: why the identified need for and benefits of the Proposed Development substantially outweigh its effects.

## 2. Site Context

- 2.1 This section confirms the location of the Proposed Development and the characteristics of Site and its surrounds. This section will also identify any relevant environmental designations.

### The Application Site

- 2.2 The application site ('the Site') is situated 2.8km west of Ramsbottom, 3.5km south of Edenfield and 6km south of Bury. The Site is located within the local authority of Rossendale close to its boundary with Rochdale. The Site is also located 4.3km south of the centre of the existing Scout Moor Wind Farm.
- 2.3 The Site covers an area of approximately 6.2 hectares (15.3 acres) and consists of pastureland (**Figure 2.1**). It is largely free of trees, with the exception of the southern boundary. A single overhead telephone line runs across the southern edge of the Site, extending from east to west. Access to the site is provided via two field gates located along the northern boundary, off the A680 (Rochdale Road).



**Figure 2.1: Site Location (Esri:2024)**

- 2.4 The site slopes from the north-west to the south-east, with a steeper gradient in the north that gradually becomes more gradual toward the centre. A small depression is situated in the north-eastern corner, extending along the eastern boundary. The site's elevation ranges from 280m to 300m.
- 2.5 The Site lies within National Character Area 36: Southern Pennines. This area forms part of the Pennine ridge of hills that stretch between the Peak District National Park and the Yorkshire Dales National Park.
- 2.6 The Site is located within the Green Belt.

## Surroundings

- 2.7 The Site is bounded to the north by the A680 (Rochdale Road), to the south by Bamford Road, to the southwest by Blacks Lane, and to the west by Close Nook Farm. The surrounding area is primarily characterised by open agricultural fields, with sporadic built development dispersed throughout, as illustrated in **Figure 2.1** above. To the south and west of the Site, there are several residential properties and farms, with Rossendale School situated further west along Blacks Lane.

## Accessibility

- 2.8 The Site can be accessed by foot via the footpath along the A680. Additionally, several public rights of way are located along Black Lane and along the northern boundary of the Site (Ref: FP1403187). Countryside Right of Way Section 15 (Ref: BW1403183) also passes along Bamford Road as shown in **Figure 2.2** below.



**Figure 2.2: Public Rights of Way Map (Source: [www.lancashire.gov.uk/public-rights-of-way-map](http://www.lancashire.gov.uk/public-rights-of-way-map))**

## Environmental Designations

### Flood Risk

- 2.9 According to the Environment Agency's Flood Risk Map, the Site is located within Flood Zone 1 indicating a low risk of flooding. The risk of Surface Water flooding between 2040 to 2060 is very low.

### Ecology

- 2.10 The Site is not located within or immediately adjacent to any designated ecological sites. It is however situated within the SSSI Risk Zone for the Lower Red Lees Pasture SSSI, Hodge Clough SSSI and West Pennines Moors SSSI to the west of the site.

### Contamination

- 2.11 The Site is not classified as Contaminated Land under Part 2A of the EPA 1990 but is located within the Lancashire Coal Mining Report Area.

#### Heritage

- 2.12 There are few designated heritage assets within proximity of the Site, the closest being Fecit Farmhouse and attached stable and shippon (Grade II) approximately 0.7km northeast of the Site.

#### **Planning History**

- 2.13 There is no relevant planning history associated to the proposed development site.

#### **Summary**

- 2.14 In summary, the application site, covers 6.2 hectares of pastureland, and is located 2.8km west of Ramsbottom. It is bordered by the A680 (Rochdale Road) to the north, Bamford Road to the south. Agricultural land with scattered residential properties surrounds the site. The Site is accessed via two gates off the A680 and has public footpaths along its boundaries.
- 2.15 The Site sits entirely within Flood Zone 1 with a small surface water flood risk in the southeast. The site does not contain any designations for ecology and the nearest designated heritage assets are located more than 0.5km away. The Site is not contaminated, and has no relevant planning history. The Site is located within the Green Belt.

### 3. Proposed Development

- 3.1 The application is for the following description of development:

*“Construction, management and operation of a Battery Energy Storage System (BESS) with associated infrastructure, including access, drainage, security measures and landscaping and provision of a connecting cable to Croston Close Road substation.”*

#### **Site Selection and Consideration of Alternative Locations**

- 3.2 The availability of capacity within the electricity grid (transmission and distribution) is highly constrained. This makes it challenging for proposals for renewable and low carbon energy generation and associated supporting infrastructure, such as BESS, to connect to the network and to support the transition to net-zero.
- 3.3 Where capacity does exist, projects are often required to wait several years before they can be connected. It is not uncommon for projects having to wait until the 2030's before connection to the grid can be achieved.
- 3.4 It is essential therefore that, if the UK is to realise its ambitions relating to decarbonisation of the electricity grid and net zero, for available grid capacity to be fully utilised wherever it exists, even more so where connection can be achieved in the short term.
- 3.5 Cubico has secured the agreement of the Distribution Network Operator (DNO) to connect the Proposed Development to the Croston Close Road substation, currently scheduled for 2029. The existing Scout Moor Wind Farm is also connected to this substation.
- 3.6 The Distribution Network Operator (DNO) allocated this Point of Connection (PoC) for the Proposed Development mindful of their obligations to consumers to provide the most cost-effective grid connection.
- 3.7 The Proposed Development will store electricity (that circulating within the network generally and that being generated by Scout Moor Wind Farm specifically) when levels of generation exceed consumer demand and will release it back to the network when required.
- 3.8 The Proposed Development will, therefore, allow the utilisation of electricity from Scout Moor Wind Farm and other forms of renewable generation more generally to be maximised.
- 3.9 In order to accommodate a development of the scale and type proposed and to support the operation of the existing Scout Moor Wind Farm / the electricity grid Cubico require a site :
- To be located within 2km of the Croston Close Road substation;
  - To be directly accessible from highway network;

- To be relatively flat topography; and
  - To be appropriately separated from sensitive receptors.
- 3.10 Securing a site which is as close as possible to the point of connection to the electricity grid minimises the length of underground cabling required, reduces the level of disruption / environmental effect in the local area during the construction phase and reduces what are known as transmission losses as electricity moves between the BESS and point of connection.

#### **Connection to the National Grid**

- 3.11 The proposed Battery Energy Storage System will be connected to the National Grid via the proposed underground cable connection route as demonstrated on the submitted Parameter Plan and Indicative Site Layout Plan. The connecting cable will be laid in trenches within the Site itself and beneath the A680 connecting to Croston Close Road substation to the south of the main BESS facility. In locating the Proposed Development within relative proximity of Croston Close Road electricity substation this limits the extent of engineering and associated works to facilitate connection to the National Grid.

#### **Main Development Components**

- 3.12 The Proposed Development will comprise the following components (for which further details are provided below):

- |                         |                                                           |
|-------------------------|-----------------------------------------------------------|
| • BESS Battery Units    | • Security Gates                                          |
| • MV Twin Skids         | • Vehicular Access from Rochdale Road                     |
| • Substation            | • Perimeter security fencing                              |
| • Customer Switchgear   | • Access track for maintenance vehicles                   |
| • Spare parts container | • Internal car parking spaces                             |
| • AUX Transformer       | • Areas of new landscaping planting and attenuation pond. |
| • Water Tank            |                                                           |
| • CCTV cameras          |                                                           |

#### **Proposed Development Parameters – The Rochdale Envelope**

- 3.13 The nature of BESS is such that technology is rapidly evolving and applications for consent are commonly made by a developer some time before the procurement of equipment commences. For example, the type, number and size of energy storage modules and other external equipment can vary depending upon the technology provider and developer's wish to retain the flexibility to select the most appropriate

equipment package having regard to technical, commercial and market availability considerations closer to the point at which construction commences.

- 3.14 It is therefore accepted practice for applications to be presented using the 'Rochdale Envelope'. The Rochdale Envelope approach is employed when some details of a project have not been confirmed and involves the developer defining a series of development parameters which together allow the assessment of a reasonable 'worst case scenario' within a suite of supporting technical documents. This in turn allows the relevant decision maker to understand the likely significance of any potential environmental effects. The Rochdale Envelope approach is commonly applied to applications considered under the Town and Country Planning Act 1990, the Planning Act 2008 and the Electricity Act 1989.
- 3.15 Having regard to the above, and to provide the Proposed Development with appropriate levels of flexibility through the detailed design phase a series of development parameters are proposed below:

**Table 3.1: Development Parameters**

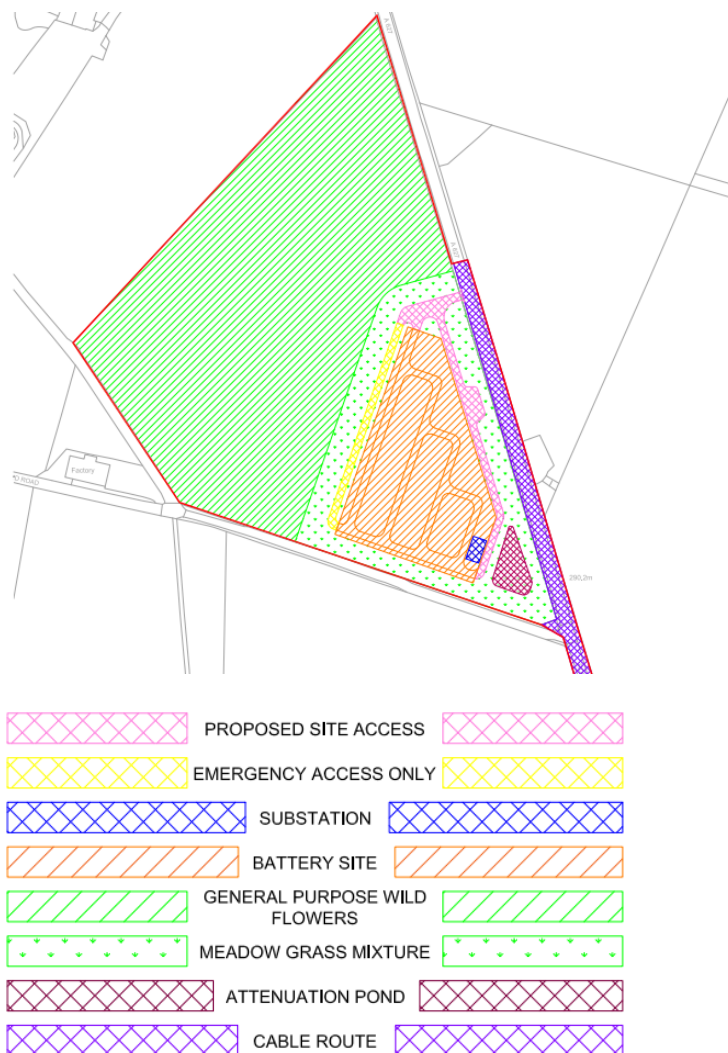
| Development Component                       | Development parameter                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Development Platform Area (BESS)            | <ul style="list-style-type: none"> <li>Maximum area: 0.85ha</li> <li>Maximum height of BESS units: 3m</li> <li>Maximum height of Transformer: 3m</li> <li>Maximum height of Water Tank: 3.1m</li> <li>Maximum height of Switch Gear/Spare Parts Storage: 2.6m</li> <li>Maximum height of AUX Transformer: 2.3m</li> </ul> <p>Maximum extent of change to existing levels: -1 to +1m</p> |
| Development Platform Area (Sub Station)     | <ul style="list-style-type: none"> <li>Maximum area: 0.01ha</li> <li>Maximum height of buildings: 3.3m</li> </ul> <p>Maximum extent of change to existing site levels: -1 to +1m</p>                                                                                                                                                                                                    |
| Internal Access Roads                       | <ul style="list-style-type: none"> <li>Maximum area: 0.16ha</li> </ul>                                                                                                                                                                                                                                                                                                                  |
| Cable Route Beneath Existing Highway        | <ul style="list-style-type: none"> <li>Maximum area: 0.72ha</li> </ul>                                                                                                                                                                                                                                                                                                                  |
| Landscaping and Biodiversity Net Gain Areas | <ul style="list-style-type: none"> <li>Maximum area: 4.25ha</li> </ul>                                                                                                                                                                                                                                                                                                                  |
| Attenuation Pond                            | <ul style="list-style-type: none"> <li>Maximum area: 0.06ha</li> </ul>                                                                                                                                                                                                                                                                                                                  |
| Security Fencing                            | <ul style="list-style-type: none"> <li>Up to 2.4m</li> </ul>                                                                                                                                                                                                                                                                                                                            |
| Security CCTV                               | <ul style="list-style-type: none"> <li>Up to 4m</li> </ul>                                                                                                                                                                                                                                                                                                                              |

- 3.16 An extract of the Parameter Plan which has been submitted for approval is shown in **Figure 3.1** below.

### Site Layout

3.17 The parameter plan for the Proposed Development is shown at **Figure 3.1** below:

**Figure 3.1: Proposed Parameter Plan**



3.18 Figure 3.2 (below) presents an illustrative site layout which demonstrates one example of how the Site could be developed working within the defined parameters.

3.19 The Design and Access Statement offers additional details regarding the fundamental design principles, the key factors influencing the proposed parameters and the iterative process that has been undertaken.

3.20 The overarching design objective has been to:

- Minimise the footprint of the development in so far as is operationally possible;
- Minimise the visibility of the battery storage containers, inverters and ancillary unit through careful siting of infrastructure and manipulation of ground levels where required;

- Ensure noise impacts can be appropriately mitigated given the relative proximity of neighbouring farmhouses;
- Introduce new landscape planting to act as a spatial and visual buffer to the main BESS development platform and to deliver a net gain to biodiversity.

### **Vehicular Access and Internal Access Tracks**

- 3.21 The Site will be accessed from Rochdale Road. The access roads within the Site will be generally of 4m width and is intended to be surfaced with a Type 1 well compacted surface layer. As shown on the Indicative Site Layout Plan there would be a circular route provided within the main BESS compound to allow for access to all units and avoid the need for turning. There would be two separate routes provided outside of the enclosed compound, one serving as an access for District Network Operators and one as an emergency access.

### **Fencing**

- 3.22 In order to provide the necessary security to the Site a 2.4m high weld mesh security fence is proposed to be constructed around the perimeter of the compound.
- 3.23 Secured gate entrances will be positioned at the Rochdale Road entrance, located to the west of the compound, to allow for emergency access, and to the south, providing access to the attenuation pond and will be similarly constructed and designed to the proposed perimeter fence.
- 3.24 CCTV facilities and modest security lighting are proposed. There is no intention to install permanent floodlighting. The details of these are capable of being controlled through planning condition.

### **Fire Water Infrastructure**

- 3.25 An Outline Fire Prevention Plan (dated March 2025), prepared by Hydrock, accompanies the application. This report details the fire engineering measures and safety protocols that will be incorporated into the design of the proposed BESS development. The plan outlines both preventive and control strategies to mitigate fire and blast hazards.

### **Landscaping and Planting Strategy**

- 3.26 A Landscape Plan (D10602.004), prepared by TEP, has been developed to outline the comprehensive and high-quality landscaping proposals for the Site. A summary of the key components of the proposed landscaping is provided below:
- Planting is proposed across the Site, most intensively surrounding the perimeter of the BESS platform:
    - Standard general purpose wild flowers across approximately half of the Site area which would remain undeveloped;

- General purpose meadow grass mixture surrounding the BESS platform up to Rochdale Lane and Black Lane;
  - Meadow Mixture for Wetlands within the attenuation pond within the south-east corner of the Site;
  - 55 no. 'feathered trees', distinguished from clear stem trees that will develop a scattered scrub appearance characteristic of the moorland setting. Species selected are native and hardy and include Birch, Mountain Ash/Rowan and Goat Willow.
- 3.27 Alongside the landscape proposal the application seeks to deliver a net gain to biodiversity. The following features have been carefully embedded into the design to enhance the biodiversity of the site:
- A high proportion of native species to contribute to and improve the biodiversity value of the Site through the selection of wildlife friendly species which provide opportunities for foraging, nesting and shelter;
  - The attenuation pond will provide valuable aquatic and wetland habitats, improving water quality, supporting diverse plant species, and enhancing local ecosystem.

### **Drainage**

- 3.28 The Site is located within Flood Zone 1, indicating that the site is at low risk of flooding.
- 3.29 The Site currently relies on natural drainage methods, the detailed surface water drainage strategy to be developed for the Site will follow the sustainable drainage hierarchy and first and foremost consider ongoing infiltration as a means of managing surface water run-off. All new roadways and stone surfaces will be designed to be permeable.
- 3.30 Any rainwater that comes into contact with the top of the battery units, inverters, substation, or ancillary units will fall to the ground and permeate naturally through the permeable surfaces.
- 3.31 The Proposed Development will not generate any foul waste, thus negating the need for foul drainage connections on the site.

### **Construction, Operation and Decommissioning**

- 3.32 It is anticipated that construction of the Proposed Development would take c.12 months. The broad sequence of construction activity would be as follows:
- Site surveys
  - Earthwork for foundations/access/cable runs
  - Balance of plant and temporary site equipment

- Major equipment delivery
  - Assembly of major equipment
  - Installation of supporting equipment
  - Testing and commissioning
- 3.33 Vehicular movements will be carefully managed throughout the construction phase to minimise simultaneous arrivals and departures. Construction activities are expected to avoid sensitive time periods, such as weekends and peak hours. A comprehensive traffic management plan and risk assessment methodology will be developed in consultation with Lancashire County Council Highways and agreed upon prior to construction, potentially as part of a planning condition.
- 3.34 As part of the construction works, a new underground 33kV cable will be laid between the site and the point of connection (at Croston Close Road Substation ). To minimise disruption to nearby residential properties, the phasing of works or the use of no-dig technology is being considered. The cable will be laid underground along the A680. The phasing details will be outlined in a Construction Management Plan, which can be secured via a planning condition.

#### **Decommissioning and Site Restoration**

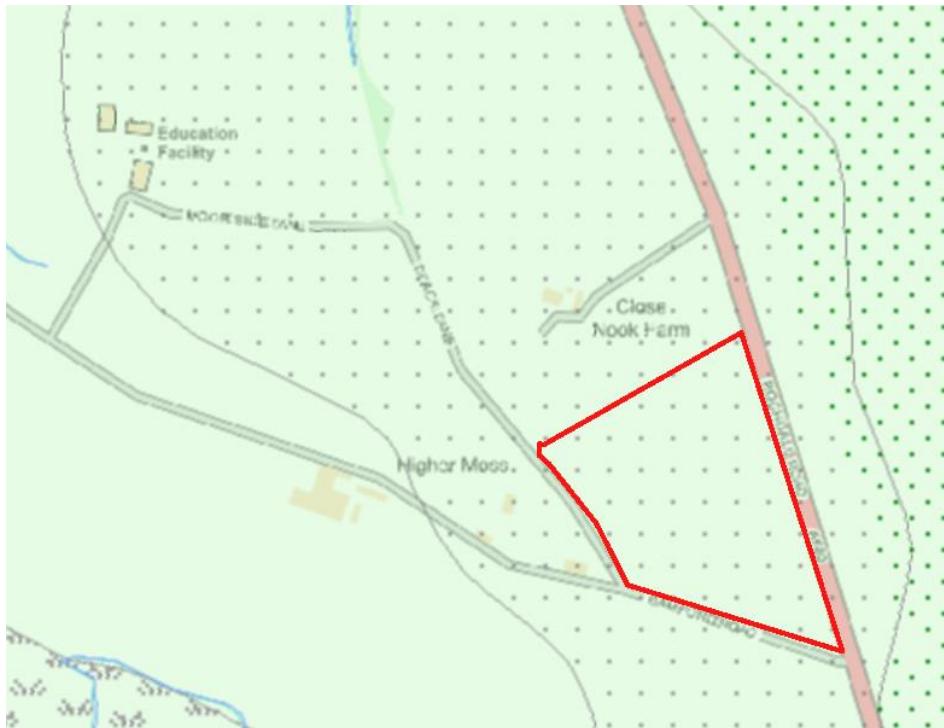
- 3.35 Planning permission is sought for a temporary period of 40 years after which the batteries and associated infrastructure will be removed from the site and the land returned to agricultural/ meadowland use. A decommissioning method statement and site restoration strategy will be prepared and submitted to the local planning authority for approval prior to decommissioning activities commencing. This can be secured by planning condition.

## 4. Planning Policy Considerations

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise.
- 4.2 The relevant adopted Development Plan comprises the Rossendale Local Plan 2019 to 2036 (adopted December 2021) and the Joint Lancashire Minerals and Waste Local Plan (adopted September 2013).

### Rossendale Local Plan (RLP)

- 4.3 An extract of the Rossendale Local Plan Policies Map is shown below in **Figure 4.1** and shows the site to be situated within the designated Green Belt (Green Overlay) and Mineral Safeguarding Area (Black Dot Overlay).



**Figure 4.1:** Extract of Rossendale Local Plan Policies Map (site outlined in red).

- 4.4 The relevant development plan policies are set out below:

#### Presumption in favour of Sustainable Development

- **Strategic Policy SD1: Presumption in Favour of Sustainable Development** - The Council will adopt a positive approach to development proposals, in line with the presumption in favour of sustainable development as outlined in the National Planning Policy Framework (NPPF). Planning applications consistent with the Local Plan policies will be approved promptly unless there are

overriding material considerations. If relevant policies are absent or outdated, the Council will grant permission unless:

- a) NPPF policies protecting specific areas or assets provide a clear reason for refusal; or
- b) any adverse impacts significantly outweigh the benefits, as assessed against the NPPF policies.

#### Green Belt and Site-Specific Policies

- **Strategic Policy SD2: Urban Boundary and Green Belt** – Seeks to direct new development in the Borough to land within the urban boundaries to ensure countryside development is only allowed where a countryside location is needed and the development enhances the rural character of the area. The RLP does not have a dedicated policy relating to development within the Green Belt and what does and doesn't constitute appropriate development, therefore the provisions of the National Planning Policy Framework take precedence in this instance.
- **Policy SD4: Green Belt Compensatory Measures** – Seeks to deliver compensatory improvements to environmental quality and accessibility where development results in the development of land within the Green Belt.
- **Strategic Policy ENV3: Landscape Character and Quality:** Seeks to protect and enhance Rossendale's distinctive landscape, including moorlands, pastures, dry stone walls, and stone-built settlements. Development proposals should conserve and, where possible, improve the natural and built environment, respecting the area's character. Proposals must be appropriately sited, designed, and landscaped to be in scale with the landscape.

#### Supporting Net Zero Infrastructure

- **Policy ENV8: Other forms of Energy Generation:** Supports renewable energy proposals provided any negative impacts, including from supporting infrastructure, are minimised. Proposals for decentralised energy generation and distribution will also be positively considered, subject to their broader environmental impacts.

#### High Quality Design

- **Strategic Policy ENV1: High Quality Development in the Borough** - New development proposals must respect local character through high-quality design, considering siting, layout, materials, and landscaping. They should protect the built and historic environment and minimise any negative impacts.

#### Technical and Development Management Policies

- **Strategic Policy ENV2: Heritage Assets:** supports development proposals that conserve or enhance Rossendale's historic environment. The policy aims to preserve designated heritage assets, protect historic landscapes, and conserve

non-designated assets. Substantial harm or total loss to the significance of a designated heritage asset will only be allowed in exceptional circumstances, while less than substantial harm may be permitted if clearly justified and outweighed by public benefits.

- **Policy ENV4: Biodiversity, Geodiversity and Ecological Network:** Development proposals impacting national or locally designated sites, protected habitats, or species must include surveys and assessments of potential impacts. A sequential approach should be used to avoid harm to biodiversity, with mitigation or compensatory measures where avoidance is not possible. Opportunities to enhance ecological networks are encouraged, and developments should retain and improve biodiversity features.
- **Policy ENV6: Environmental Protection:** Requires that development proposals minimise pollution and land instability risks to health, amenity, and the environment through relevant assessments, appropriate mitigation measures, and sensitive design.
- **Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality:** All development proposals must assess flood risk and avoid flooding, surface water or drainage issues. Flood Risk Assessments are required for developments in Flood Zones 2 and 3, with appropriate mitigation. Surface water must be managed through a hierarchy, prioritising soakaways and infiltration. On greenfield sites, discharge should mimic natural patterns, and on previously developed sites, runoff should be reduced to greenfield rates. Sustainable drainage systems (SuDS), should be incorporated, with clear management and maintenance plans.

## **Joint Lancashire Minerals and Waste Local Plan**

- 4.5 As shown in Figure 4.1 above, the application site is allocated within a Mineral Safeguarding Area on the Policies Map. The relevant policies are set out below:

- **Policy M2: Safeguarding Minerals:** Development within Mineral Safeguarding Areas will only be approved if:
  - The mineral is no longer valuable or fully extracted.
  - The mineral can be extracted before development.
  - The development is temporary and the site can be restored.
  - The need for development outweighs the mineral resource protection.
  - Extraction is not possible due to depth or stability issues.

- 4.6 Other documents that are a material consideration include, but aren't limited to, the National Planning Policy Framework ('the Framework') (adopted February 2025), National Planning Practice Guidance ('PPG'), adopted Supplementary Planning Documents ('SPD'), National Policy Statements ('NPS').

## National Planning Policy Framework (NPPF)

- 4.7 The National Planning Policy Framework (NPPF), revised in February 2025, is an important material consideration in the determination of BESS application within the Green Belt. Paragraph 2 of the NPPF states that planning permission should be granted for development that aligns with the Development Plan, unless there are material considerations that indicate otherwise.
- 4.8 The NPPF confirms that the primary purpose of the planning system is to facilitate sustainable development. To achieve this, the system is underpinned by three overarching objectives (Economic, Social and Environmental), which are interrelated and should be pursued in a mutually supportive manner. This approach ensures that opportunities are maximised to deliver net gains across each of the objectives.
- 4.9 The NPPF establishes a presumption in favour of sustainable development. Paragraph 11 of the NPPF, specifies that development proposals that align with the Development Plan should be approved without delay. Where the Development Plan is silent, absent, or where relevant policies are outdated, permission should be granted unless any adverse impacts significantly and demonstrably outweigh the benefits, in line with policies in the NPPF that restrict development.
- 4.10 Paragraph 85 states that significant weight should be placed on the need to support economic growth and productivity, which involves the wider opportunities for development. Paragraph 87 requires that planning decisions should recognise and respond to specific locations requirements of different sectors.
- 4.11 Chapter 4 of the NPPF, on 'Decision Making', highlights at paragraph 39 the need for local planning authorities to approach development proposals positively and creatively. The same paragraph encourages decision-makers to seek approval for sustainable development where possible.
- 4.12 Chapter 13 of the NPPF sets out the Government's policy position on the Green Belt. Specifically, Paragraph 142 attaches great importance to the Green Belt, with Paragraph 143 listing the five purposes of the Green Belt.
- 4.13 Paragraph 153 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt – to which substantial weight should be attached – and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 4.14 Paragraph 154 lists exceptions for the construction of new buildings in the Green Belt, which would not be regarded as inappropriate development.
- 4.15 The paragraph most relevant to the Proposed Development is set out below:

*160. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental*

**benefits associated with increased production of energy from renewable sources. (Our Emphasis)**

- 4.16 Chapter 14 of the NPPF outline policy guidance on meeting the challenge of climate change, flooding and coastal change. Paragraph 161 of the Framework supports the supply of renewable and low carbon energy generation installations and associated infrastructure, stating that “the planning system should support the transition to net zero by 2050 and take full account of all climate impacts”.
- 4.17 Paragraph 162 of the Framework adds that “Plans should take a proactive approach to mitigating and adapting to climate change”. Paragraph 165 of the Framework sets out the use and supply of renewable and low carbon energy and heat, new development must:
- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
  - b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
  - c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.*
- 4.18 Paragraph 168 of the NPPF sets out the policy guidance for determining renewable and low carbon developments, requesting the Local Planning Authorities:
- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future;*
  - b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;*
  - c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.*
- 4.19 Paragraph 170 of the Framework confirms that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 4.20 Local Planning Authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk

assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; and it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate (paragraph 181 of the NPPF).

- 4.21 Section 15 of the NPPF focuses on conserving and enhancing the natural environment. Planning decisions should improve the local environment by preventing pollution (soil, air, water, or noise) and seeking to remediate degraded or contaminated land while delivering net biodiversity gains.
- 4.22 Section 16 addresses the historic environment, recognising heritage assets as irreplaceable. Paragraph 210 emphasises sustaining and enhancing heritage assets through viable uses consistent with their conservation while ensuring new development contributes positively to local character.
- 4.23 Paragraph 212 gives great weight to conserving designated heritage assets, defined as managing change to sustain or enhance their significance. Paragraphs 214 and 215 distinguish between ‘substantial’ and ‘less than substantial’ harm, requiring harm to be balanced against public benefits, including securing the asset’s optimum viable use, while recognising statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.

## **Other Material Considerations**

### **National Policy Statements**

- 4.24 The energy National Policy Statements (“NPSs”) set out the government’s policy for the delivery of Nationally Significant Infrastructure Projects (“NSIPs”) and other infrastructure development in the field of energy, providing the predominant planning policy framework for planning decisions in respect of such development. They were first designated and published in 2011.
- 4.25 The latest NPSs came into force on 17<sup>th</sup> January 2024, including the Overarching National Policy Statement for Energy (EN-1), the NPS for Renewable Energy Infrastructure (EN-3), and the NPS for Electricity Networks Infrastructure (EN-5), as explored further below.
- 4.26 They are an up-to-date expression of government policy on energy infrastructure.

### ***The Overarching National Policy Statement for Energy (EN-1)***

- 4.27 NPS EN-1 sets out the Government policy for the delivery of major energy infrastructure development and its ambition to decarbonise the power sector.
- 4.28 Paragraphs 1.2.1 and 1.2.2 of NPS EN-1 state that: *“In England, this NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether the policies in this NPS are material and to what extent, will be judged on a case-by-case basis and will depend upon the extent to which the matters are already covered by applicable planning policy”*

- 4.29 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government has concluded that there is a Critical National Priority ('CNP') for the provision of nationally significant low carbon infrastructure.
- 4.30 Infrastructure is defined as nationally significant low carbon infrastructure. Low carbon infrastructure is defined as “.. *energy infrastructure technologies, fuels, pipelines and storage infrastructure which fits within the normal definition of low carbon*” (Paragraph 4.2.5).
- 4.31 It is instructive to note that Inspector's in recent appeal decisions for BESS applications have concluded that the delivery of BESS is a CNP<sup>2</sup>.
- 4.32 Paragraph 3.3.63 of NPS EN-1 states that:
- “the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. **Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible**”* (emphasis added).
- 4.33 Paragraph 3.3.3 highlights that the demand for electricity could more than double by 2050 “as large parts of the economy including transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity”.
- 4.34 Paragraphs 3.3.25 – 3.3.27 specifically confirm that “**storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated. Storage is needed to reduce the costs of the electricity system and increase reliability.**”
- 4.35 Paragraph 3.3.27 on the role of electricity storage concludes:
- “Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.”*
- National Policy Statement for Renewable Energy Infrastructure (EN-3)**
- 4.36 NPS EN-3 outlines the Government's framework for decision-making on the development of all forms of renewable energy projects.
- 4.37 It emphasises the importance of increasing renewable energy capacity to meet the climate goals whilst minimising the adverse effects on communities and landscapes.

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<sup>2</sup> Appeal Ref: APPV-1505-W-23-3332888 (Paragraph 31) and Appeal Ref: APP/C4615/W/24/3341383 (Paragraph 34)

- 4.38 It also highlights that electricity storage is essential for a net zero energy system. It adds that:

*“the need for electricity storage is rising as we increase the volume of variable renewables and increase peak demand through the electrification of heat and transport. It (electricity storage) will be critical to maintaining energy security as we shift away from gas over the 2020s-30s”.*

- 4.39 EN-3 also indicates in respect of renewable energy infrastructure that the “scale of development will inevitably have impacts, particularly if sited in rural areas” (Paragraph 2.10.17).

**National Policy Statement for Electricity Networks Infrastructure (EN-5)**

- 4.40 The NPS EN-5 is relevant to all infrastructure for electricity networks, including both transmission systems and distribution systems.

- 4.41 It recognises that the security and reliability of the UK’s current and future energy supply is:

*“highly dependent on having an electricity network which will enable the new electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security”* (Paragraph 1.1.1).

- 4.42 EN-5 also highlights that the functional design constraints of safety and security for electricity network infrastructure may limit the ability to influence the aesthetic appearance of that infrastructure (Paragraph 2.4.3). Hence, *“the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened”* (Paragraph 2.4.4).

- 4.43 Therefore, EN-5 supports the delivery of new and upgraded electricity generation, storage, and interconnection infrastructure to ensure a reliable electricity supply, particularly as the country transitions to more renewable energy sources.

**National Planning Practice Guidance**

- 4.44 The National Planning Practice Guidance (“NPPG”) supports the Framework and in respect of Renewable and Low Carbon Energy it states that *“increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse emissions to slow down climate change and stimulate investment in new jobs and businesses”.*

- 4.45 Additionally, it states that *“planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable”.*

- 4.46 Most notably NPPG was amended in August 2023 to include guidance specific to Battery Energy Storage Systems. It confirms that BESS can help *“to balance the system at lower cost, maximising the usable output from intermittent low carbon generation*

*(e.g. solar and wind), and deferring or avoiding the need for costly network upgrades and new generation capacity”.*

## **Other Relevant Strategies and Policies**

### **The Paris Agreement**

- 4.47 The Paris Agreement is a legally binding international treaty on climate change, to which the UK has signed up. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. To achieve this long-term temperature goal, countries aim to reach global peaking of greenhouse gas emissions as soon as possible to achieve a climate neutral world by 2050.

### **Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (2024)**

- 4.48 The Clean Power 2030 report published in November 2024 was prepared by the National Energy System Operator (NESO) – an independent body set up by the Secretary of State and the Department for Energy Security and Net Zero (DESNZ) to advise on strategy for achieving clean power ambitions by 2030.
- 4.49 The report recognises that “as the energy system becomes more reliant on weather-dependent sources of generation, flexible technologies, such as storage and interconnection to other markets, will be crucial during periods of low generation and high demand”.
- 4.50 This means that energy storage capacity needs to grow significantly in order to accommodate the growth in sustainable energy generation. With specific reference to battery-energy storage systems the report states that “Our pathways see battery capacity increase from around 5GW in 2023 to between 23 and 27 GW in 2030”. The report highlights the importance of BESS facilities in providing flexibility by cycling regularly to help match supply and demand.

### **Clean Power 2030 Action Plan: A new era of clean electricity (2024)**

- 4.51 The Clean Power 2030 Action Plan (December 2024) informed by the abovementioned NESO report set out the UK Governments commitment to delivering clean power by 2030 by tackling three identified challenges:
- To maintain a secure and affordable energy supply
  - To create new industries and investments around the county
  - To protect the environment we live in from the damaging effects of climate change.
- 4.52 The Action Plan outlines the steps towards achieving a clean power system, detailing government actions to support and accelerate the delivery of necessary infrastructure, and how the government will collaborate with all stakeholders to reach this goal.
- 4.53 The Action Plan sets ambitious targets, recognising the need for flexible capacity. The Plan confirms there to be only 4.5GW of battery storage capacity in Great Britain at present, the majority of which is grid-scale. Based on NESO and DESNZ battery storage growth scenarios for 2030 as identified within the abovementioned report, it is

anticipated that 23-27 GW of battery storage to be needed by 2030 to support clean power, a very significant level of increase.

- 4.54 The Plan highlights that battery storage can play a key role in helping Britain achieve clean power in a cost-effective manner, while reducing the delivery risks associated with other forms of energy infrastructure. The Action Plan also notes the opportunities relating to BESS facilities to be ‘huge’ – *“Battery storage and consumer-led flexibility are scalable and could be relatively quick to deploy. Their deployment could not only cut bills for consumers but minimise the amount of more costly generation and associated network infrastructure that needs to be built, whilst maintaining security of supply”*.
- 4.55 The Action Plan also reiterates the benefit to the public purse, through providing a more reliable and consistent energy supply and reducing domestic and business bills. The Plan states that *“If gas price spikes occurred even once every decade, it could cost the UK between 2-3% of GDP annually, adding 13% of GDP to public debt by 2050.”*<sup>3</sup>

#### **National Grid Future Energy Scenarios Report (2024)**

- 4.56 The National Grid Future Energy Scenarios Report (‘FES’) (July 2024) examines possible scenarios for the UK’s energy system, with a focus on achieving net-zero emissions by 2050. The report explores different policy, technological, and societal assumptions, modelling the potential roles of renewables, nuclear, and hydrogen in the energy mix. It highlights the importance of flexibility and resilience in the energy system and examines implications for energy security and costs.
- 4.57 It also highlights that to achieve the goal of net zero emissions by 2050, the energy system will need to continually adapt. The FES presents three net zero ‘pathways’, viable scenarios for the development of energy between now and 2050, plus a ‘Counterfactual’ which does not meet the 2050 net zero target (page 20).
- 4.58 National Grid recognises the delivery of energy storage as a key immediate action “to deliver the fundamental change required for a fair, affordable, sustainable and secure net zero energy system by 2050” (Page 21). The flexibility offered by battery storage systems is also recognised as increasingly important in the move towards a Net Zero system (Pages 41 and 89), particularly in accommodating new solar generation (Page 114).
- 4.59 The Report specifically confirms that all pathways for Net Zero are reliant upon the substantial installation of battery storage capacity between 2025 – 2030, to around five times the current capacity (Figure ES.16, Page 119). For instance, under the ‘Holistic Transition’ pathway, National Grid would expect to see 28GW of battery storage installed by 2030 (from the current capacity of 4.7GW), reaching 36GW by 2050. Even in the ‘Counterfactual’ scenario this rapid installation of battery storage capacity is required, to just under 23GW by 2050. Hence, the Report highlights that battery storage must be accommodated accordingly.

#### **UK Battery Strategy (2023)**

- 4.60 The Government published the UK’s first battery strategy in November 2023, setting out its vision for the UK to achieve a globally competitive battery supply chain by 2030.

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<sup>3</sup> CCC (2023), ‘A Net Zero Workforce’ (viewed in December 2024)

Whilst the Strategy primarily relates to the production of batteries, it recognises the important role of battery storage technology.

- 4.61 The strategy adds that batteries will enable us to use energy in a more flexible way that supports decarbonisation goals by helping to balance the system, maximise the usable output from renewable energy, and avoid the need for new generation capacity.

**UK Climate Change Act (2008) and Carbon Budgets (June 2019)**

- 4.62 The legislation requires the country to achieve net zero greenhouse gas emissions by 2050, compared to the previous target of an 80% reduction from 1990 levels. This target calls for a significant increase in renewable energy, the development of carbon capture and storage technology, the construction of new nuclear generation and a transition to hydrogen and electric for heating and transportation.

**Committee on Climate Change: Net Zero, The UK's Contribution to Stopping Global Warming (May 2019)**

- 4.63 The Report outlines different pathways to decarbonise the economy and emphasises the decreasing costs of significant renewable technologies like battery storage and recommends promoting flexibility in the energy sector through demand response, storage, and interconnection.

**Committee on Climate Change: Progress in reducing emissions, 2023 Progress Report to Parliament (June 2023)**

- 4.64 The report outlines the Committee's reflections on the UK's progress for reducing emissions and provides recommendations to reduce emissions still further. The Committee advised that "the planning system must have an overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero".
- 4.65 The report recognises that a comprehensive, standalone plan or strategy is required for achieving a decarbonised and reliable electricity system by 2035. The report also highlights an urgent need for policy action to ensure adequate network capacity and connections, expedite the deployment of low-carbon flexibility solutions, and reform electricity market design.

**National Infrastructure Strategy (November 2020)**

- 4.66 The Strategy outlines a comprehensive approach to infrastructure investments aimed at promoting sustainable economic growth and achieving net-zero emissions by 2050. It advises that a successful expansion of the power system requires additional investment in network infrastructure, flexible sources like storage, demand response, and interconnection, and sufficient low-carbon generation capacity to provide most of the UK's electricity needs.
- 4.67 The measures set out in this Strategy are to be delivered through objectives set out in the framework '10-Point Plan for a Green Industrial Revolution'. The 10- Point Plan includes investing in offshore wind, low-carbon hydrogen, nuclear power, and energy storage, as well as the development of carbon capture technologies (Page 26).

**The National Infrastructure Commission: Net Zero, Opportunities for the Power Sector (March 2020)**

- 4.68 The Report examines how the UK can achieve net-zero emissions by 2050. The report identifies key areas of investment such as storage and demand response, and sufficient low-carbon power generation. It also emphasizes the need to balance emissions reduction, system security, and affordable electricity for households and businesses.

**National Infrastructure Commission: Smart Power (March 2016)**

- 4.69 The Report emphasises the benefits of energy storage to cutting costs for consumers and reducing carbon emissions.

**Environment Act (December 2021)**

- 4.70 The Environment Act 2021 has enshrined into law the requirement to deliver at least 10% biodiversity net gain (BNG) in development projects.

**Local Supplementary Planning Documents/Guidance adopted by RBC.**

**Rossendale Climate Emergency Climate Emergency Objectives.**

- 4.71 In September 2019, Rossendale Borough Council declared a 'Climate Emergency' and joined a number of local authorities who declared a motion on climate change. RBC has pledged to work towards ensuring that the Council and the Borough is carbon neutral by 2030.

- 4.72 The Boroughs Climate Change Strategy<sup>4</sup> acknowledges that a key contribution to helping climate change is through:

*'Both a reduction in the overall consumption of energy and the adoption of more renewable energy sources to fulfil our local demand.'*

- 4.73 The Borough's Climate Change Strategy places an emphasis on 'actively' moving to more renewable sources of energy generation.

- 4.74 There is one adopted Supplementary Guidance Document which can be deemed relevant to the Site and Proposed Development:

- Climate Change (Adopted 7<sup>th</sup> December 2022)

**Climate Change SPD**

- 4.75 Chapter 4 of the Climate Change SPD offers guidance how to 'Improve energy efficient and promote renewables in the Borough'. The Council anticipates the implementation of suitable measures and technologies to support the Borough's energy efficiency goals. The SPD specifically references BESS as an example of a potential technology:

*'Battery Storage is used to overcome fluctuations in the generation of electricity from wind or solar energy, and planning applications are coming forward.'*

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<sup>4</sup> [Rossendale Borough Council - Climate Change Strategy 2020 - 2030](#)

## Summary

- 4.76 The Site is situated within the Green Belt. When located in the Green Belt, elements of many renewable energy projects comprise inappropriate development. In such cases very special circumstances will need to be demonstrated if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.
- 4.77 Both national and local planning policies, along with numerous legislations, strategies and policies, strongly support the establishment of additional infrastructure for renewable energy production and electricity storage. However, it is crucial to ensure that such facilities are appropriately located, where adverse effects on the natural and built environment can be avoided, minimised and mitigated as necessary.
- 4.78 Battery storage is recognised as a crucial technology for improving energy flexibility and enabling optimal use within power systems. Energy storage projects are also considered vital for the UK's transition away from fossil fuels and for achieving its climate change goals.

## 5. Green Belt Assessment

- 5.1 This section considers the principle of development by appraising the Proposed Development against Green Belt policies contained within the Rossendale Local Plan and the NPPF.
- 5.2 The Government places significant emphasis on the protection of the Green Belt, with their primary purpose being to prevent urban sprawl by ensuring that land remains permanently open (Framework Para 137). Inappropriate development will only be permitted in "Very Special Circumstances" (VSC), which can only be demonstrated if the harm caused to the Green Belt through inappropriateness, along with any other associated harm, is clearly outweighed by other material considerations.
- 5.3 The importance of the Green Belt is also confirmed through the Rossendale Local Plan and although there is no specific policy relating to what constitutes inappropriate or appropriate development within the Green Belt, there is an expectation that development within the Green Belt provides 'compensatory measures' to improve environmental quality and accessibility.
- 5.4 The Very Special Circumstances test has been reviewed on several occasions by the courts. However, the principles are now well-established, with the test requiring a broad discretion on the part of the decision-maker.
- 5.5 In *R (on the application of Temple) v Basildon District Council* [2004] EWHC 275929 (Admin) Sullivan J (as he then was)<sup>5</sup> observed:

*"...the decision-taker must be able to point to a circumstance, or combination of circumstances which, viewed objectively, is reasonably capable of being described as 'very special'," (paragraph 15)*

*"The short answer to the claimant's argument is that in planning, as in ordinary life, a number of ordinary factors may when combined together result in something very special. Whether any particular combination amounts to very special circumstances...will be a matter for the planning judgement of the decision-taker" (paragraph 17)*

*"...The question is not merely whether there are very special circumstances, but whether those circumstances clearly outweigh the harm done by reason of inappropriateness and any other harm. Thus, a combination of factors which amounted to special circumstances might be sufficient to clearly outweigh the limited degree of harm that would be caused by granting planning permission upon one particular site, but the same or a similar combination of factors might well be insufficient to justify the grant of planning permission for a site that was more harmful in planning terms, for example because it had a greater impact upon the underlying objectives of the Green Belt; it was more harmful*

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<sup>5</sup> [Basildon District Council, R \(on the application of\) v Temple \[2004\] EQHC 2759 \(Admin\) \(08 November 2004\) \(bailii.org\)](#)

*in terms of the character or appearance of the countryside; it had a greater effect upon residential amenity and/or highway safety, etc.” (paragraph 18*

- 5.6 The judgment clarifies that, although individual factors may be considered ordinary, their combined effect could clearly outweigh the harm caused by development proposals in the Green Belt, including harm arising from inappropriateness, thus satisfying the Very Special Circumstances test.
- 5.7 This approach was most recently confirmed in *Sefton MBC v SSHCLG* [2021] EWHC 108230 (Admin)<sup>6</sup>, the High Court further observed that NPPF 143 and 144 ‘do not ... require a particular mathematical exercise nor do they require substantial weight to be allocated to each element of harm as a mathematical exercise with each tranche of substantial weight then to be added to a balance.’
- 5.8 At paragraph 34, the Court further stated that the remaining task requires a ‘single exercise of judgement to assess whether there are very special circumstances which justify the grant of permission notwithstanding the importance of the Green Belt.’

#### **Policy Assessment**

- 5.9 In accordance with national policy, the potential harm to the Green Belt must be assessed in relation to the following four factors:
- The definitional harm resulting from any inappropriate development in the Green Belt;
  - The impact on the openness of the Green Belt; and
  - The impact on the purposes of including land within the Green Belt.
  - Any other harm.
- 5.10 It is also necessary to consider the extent to which the Proposed Development is aligned with national policy objectives which encourage the beneficial use of Green Belt Land.
- 5.11 The following sub-sections address each in turn below and subsequently consider whether there are ‘other considerations’ of sufficient weight to outweigh the identified harms such that Very Special Circumstances can be considered to exist.

#### **Definitional Harm**

- 5.12 Paragraph 154 of the NPPF states that local planning authorities should regard the construction of new buildings as inappropriate development in the Green Belt. Paragraphs 154 and 155 then provide a closed list of “exceptions” (i.e. development that would not be inappropriate development in the Green Belt)

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<sup>6</sup> [Sefton Metropolitan Borough Council v Secretary of State for Housing, Communities, and Local Government \[2021\] EWHC 1082 \(Admin\) \(07 May 2021\) \(bailii.org\)](#)

- 5.13 The creation of access roads into and within the Site and the provision of new tree planting / other areas of landscape planting would not comprise built development and would not, therefore, be inappropriate.
- 5.14 However, when taken as a whole the Proposed Development would be inappropriate development within the Green Belt and result in definitional harm. This attracts substantial weight.

### **Harm to Openness**

- 5.15 Maintaining the openness of the countryside is a fundamental objective of Green Belt policy. Case law has addressed the inappropriateness of development in relation to 'openness,' confirming that the impact of development on openness must not be assessed solely in spatial terms but must also take into account its visual impact. In *Samuel Smith Old Brewery (Tadcaster) v North Yorkshire CC* [2018] EWCA Civ 489, the Court of Appeal<sup>7</sup> stated that:

*'Whether, in the individual circumstances of a particular case, there are likely to be visual as well as spatial effects of the openness of the Green Belt, and if so, whether those effects are likely to be harmful or benign, will be for the decision-maker to judge. But the need for those judgements to be exercised is in, my view inherent in the policy.'*

- 5.16 The effect of the Proposed Development on openness of the Green Belt is considered below:
- 5.17 The Site consists of an undeveloped field bordered to the north by the A680 (Rochdale Road), to the south by Bamford Road, to the southwest by Black Lane, and to the west by Close Nook Farm. An overhead telephone line runs along the southern edge of the Site, stretching from east to west. Access is provided via two field gates located along the northern boundary, off the A680. The sense of openness is somewhat diminished by the presence of the overhead lines traversing adjacent fields, as well as by the existing dwelling and farm buildings to the west, and individual residential properties, farms, and a school situated along Blacks Lane.
- 5.18 Nevertheless, by virtue of developing a presently open field, the Proposed Development would have an impact on the openness of the Green Belt comprising both spatial and visual impacts.
- 5.19 Development will be focused on the eastern portion of the Site, with a majority of the Site area remaining undeveloped, which will serve to both screen views of the Proposed Development and soften the visual impact of the development. Enhancements to modified grassland will also provide biodiversity net gain. The battery storage units themselves and associated enclosures will be relatively low rise and finished in a RAL palette which allows them to assimilate into the landscape, and mitigating in particular longer-range views of the site.

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<sup>7</sup> *Samuel Smith Old Brewery (Tadcaster) v North Yorkshire CC* [2018] EWCA Civ 489 (NB this aspect of the judgment not impacted by the judgment of the Supreme Court: [2020] UKSC 3).

- 5.20 The Landscape and Visual Appraisal Report (prepared by TEP) and submitted in support of the application concludes:

*“The Proposed Development would introduce battery storage development into the Green Belt, however these structures are low in height and their effects on the visual aspect of openness of the Green Belt have been minimised through their siting on the lowest ground, through the appropriate use of colour to appear recessive in the landscape and through the implementation of an appropriate landscape treatment in keeping with the character of the moorland fringe. This LVA has found that the effects of the Proposed Development will be restricted to a localised geographical area and would not result in substantial harm to landscape character beyond the Site boundary, nor would there be substantial detrimental effects to visual amenity.”*

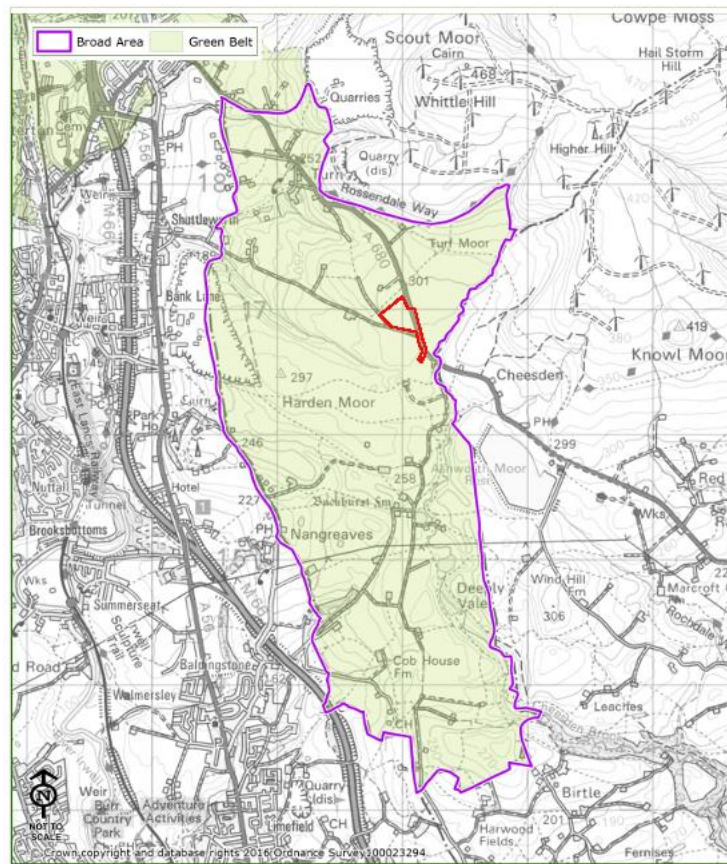
- 5.21 Furthermore, National Planning Guidance indicates that an assessment of the impact on openness should take into account the duration of the development and any plans for restoring the land to its original condition (Paragraph: 013 Reference ID: 64-013-20250225). In this instance, the Proposed Development is proposed for a temporary 40-year permission, and the applicant proposes a planning condition to secure a site restoration strategy meaning that the impacts are reversible thus reducing the degree of harm caused.
- 5.22 Taking the above into account it can be concluded that the harm caused to the openness of the Green Belt would be **moderate** albeit this harm would be temporary and entirely reversible upon decommissioning and site restoration.

#### **Impact on the Purposes of Including Land within the Green Belt**

- 5.23 The Rossendale Green Belt Review<sup>8</sup> was prepared by LUC on behalf of Rossendale Borough Council in preparation of Rossendale Local Plan. The assessment determines the extent to which the land defined as being within the Green Belt contributes to the purposes of including land within it.
- 5.24 The application site is located within land parcel reference 52 as shown in Figure 5.1 below, which is located to the south of Edenfield and east of Shuttleworth. The parcel is contained by Croston Close Road to the west. There are existing urbanising features within the parcel in the form of agricultural buildings, waste collection services, school, manufacturing and isolated dwellings. The vast remainder of the parcel comprises of pasture fields.

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<sup>8</sup> [Rossendale Green Belt Review - November 2018](#)



**Figure 5.1: Extract from Rossendale Detailed Green Belt Assessment showing Parcel 52 (with site outlined in red)**

- 5.25 The purposes of including land within the Green Belt are set out within paragraph 143 of the NPPF. Table 5.1 below assesses the impact of the Proposed Development on those purposes.

**Table 5.1: Assessment of Impact on Purposes of Including Land within the Green Belt<sup>9</sup>**

| Purpose                                                      | Assessment                                                                                                                                                                                                                                                                                                                                             |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) To check the unrestricted sprawl of large built-up areas | <p>The assessment of Parcel 52 within the RGBA has not considered the prevention of sprawl as Parcel 52 is within a 'Broad Area' separated from the urban edge by intervening parcels.</p> <p>The Proposed Development is not immediately adjacent a built-up area and given its distance from urban edges, it would not appear as sprawl from any</p> |

<sup>9</sup> [Rossendale Borough Council - Detailed Green Belt Assessment](#)

|                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                     | large built-up areas. It is also contained between two roads. There would be <b>no harm</b> to this Green Belt purpose.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| (b) To prevent neighbouring towns from merging into one another     | <p>The RGBA confirms that Parcel 52 offers no contribution to this purpose as it does not lie directly between two settlements.</p> <p>In consideration of the above and in consideration of the limited scale of development it can be concluded that the Proposed Development would not contribute to or result in neighbouring towns merging together. There would be <b>no harm</b> to this Green Belt purpose.</p>                                                                                                                                                                                                                                             |
| (c) To assist in the safeguarding the countryside from encroachment | <p>Parcel 52 of the RGBA is assessed as making a strong contribution to this purpose.</p> <p>The Site is in the moorland fringe landscape in the Green Belt. It is an area of open countryside and is a largely undeveloped landscape (in terms of urban development) however there is already other energy related development present in the landscape including Scout Moor Wind Farm and Croston Close Road substation.</p> <p>Notwithstanding, the Proposed Development would result in some encroachment into the countryside resulting in <b>moderate harm</b> to this Green Belt purpose notwithstanding the relatively modest footprint of development.</p> |
| (d) To preserve the setting and special character of historic towns | <p>Parcel 52 of the RGBA is assessed as making a strong contribution to this purpose.</p> <p>The application site itself has no physical or visual links to a historic town.</p> <p>The introduction of the proposed development would cause <b>no harm</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                    |

|                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (e) To assist urban regeneration by encouraging the re-use of derelict and other land. | <p>All Green Belt sites contribute to this purpose.</p> <p>An alternative site assessment has been carried which confirms the basis on which the Site has been selected. It is not feasible to locate the Proposed Development on Brownfield land within an urban area given the intervening distance to the identified point of connection to the electricity grid.</p> <p>It is concluded that there would be <b>no harm</b> to this Green Belt purpose.</p> |
|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Policy SD2 Green Belt Compensatory Measures

- 5.26 Policy SD4 relates to development of land within the Green Belt and requires the delivery of compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 5.27 The application site extends to over 6 hectares of which 0.8ha would be utilised for built development with the remainder to be subject of enhancement works designed to deliver a biodiversity net gain to the order of 24.28% which exceeds statutory requirements. The Landscape Plan submitted in support of the application constitutes an environmental enhancement of the Green Belt providing for extensive meadow and wildflower ground planting across the entire Site outside of the BESS compound and 55 no. feathered trees. The Proposed Development also incorporates mitigation to reduce the visual impact of the BESS facility as far as practicable including incorporating a RAL colour palette which allows it to assimilate with the surrounding landscape.
- 5.28 In terms of accessibility, the Proposed Development would not impinge on any existing public right of way or other footpaths. Given the need to ensure a secure Site and the presence of existing pedestrian routes around all corners of the main field subject to this application, enhancements are not deemed to be necessary.
- 5.29 In consideration of the landscape and biodiversity measures that would be delivered it is considered that the Proposed Development meets the expectations of Policy SD4 of the RLP.

## Summary of Impact on the Green Belt

- 5.30 In summary, it is considered that the development would result in the following impacts on the purposes of including land in the green belt:

**Table 5.2: Summary of Impacts on Green Belt Purposes**

| Consideration | Assessment |
|---------------|------------|
|---------------|------------|

|                                                           |                                              |
|-----------------------------------------------------------|----------------------------------------------|
| Definitional Harm                                         | Inappropriate development. Substantial harm. |
| Openness of the Green Belt                                | Moderate harm                                |
| Purpose A: Checking unrestricted sprawl                   | No harm                                      |
| Purpose B: Preventing towns from merging                  | No harm                                      |
| Purpose C: Safeguarding the countryside from encroachment | Moderate harm                                |
| Purpose D: Preserving the setting of historic towns       | No harm                                      |
| Purpose E: Promoting urban regeneration                   | No harm                                      |
| Overall harm to purposes                                  | Moderate Harm                                |

#### Assessment of 'Other Harm'

- 5.31 Section 7 of this report presents an overview of the conclusions from various technical assessments, which evaluate the potential impact of the Proposed Development on relevant technical and environmental factors. It confirms the extent to which the Proposed Development may cause 'other harm' to be weighed in the overall planning balance alongside the above Green Belt Assessment.
- 5.32 In summary, the following additional 'harm' has been identified:
- The Proposed Development would result in harm to landscape character and visual amenity as set out within the supporting Landscape Visual Appraisal (LVA) prepared by TEP. These impacts vary depending on receptor and operational year of the Proposed Development ranging from 'negligible' to 'modest'. The LVA concludes that the effects of the Proposed Development will be restricted to a localised geographical area and would not result in substantial harm to landscape character beyond the Site boundary, nor would there be substantial detrimental effects to visual amenity. Therefore, harm to landscape character and visual amenity are both considered to be **moderate**.
  - On a similar note, Policy SD2 of the RLP requires development outside of urban boundaries to 'enhance the rural character of the area'. Whilst the Proposed Development enhances biodiversity, and mitigates impacts on landscape character as far as practicable the Proposed Development would not 'enhance' rural character. With these factors in mind and the temporary nature of the Proposed Development it is considered that harm caused is **limited**.

- In respect of grade II listed Fecit Farmhouse with attached stable and shippon, it is concluded that a very **limited** degree of harm would be caused to significance as a result of change within its setting as a result of the Proposed Development. The level of harm is concluded to be 'less than substantial' in NPPF terms and shall be weighed against the public benefits presented by the Proposed Development,

### **Very Special Circumstances**

5.33 In order for the VSC to exist, the totality of any harm identified must be clearly outweighed by the benefits / material considerations supporting the Proposed Development.

5.34 As the courts have noted, the material considerations do not themselves all have to be "very special", they can indeed be ordinary when considered individually. However, when considered cumulatively they must clearly outweigh the harm identified such that, overall, the VSC necessary for a grant of planning permission in the Green Belt exists.

5.35 The VSC in this case is comprised of six component elements:

**VSC 1:** The Proposed Development will contribute to addressing the national need for Battery Energy Storage Systems (BESS) facilities. By enabling the maximisation of usable output from intermittent renewable energy sources, such as wind and solar, it will support the achievement of legal obligations and policy goals related to climate change, while also enhancing national energy security.

**VSC 2:** The Proposed Development will contribute to achieving Climate Emergency objectives, particularly by reducing greenhouse gas emissions.

**VSC 3:** There are no alternative sites located outside the Green Belt that can accommodate the Proposed Development which are within a reasonable distance of the identified point of connection to the electricity network (2km).

**VSC 4:** The development will contribute to the enhancement of the local biodiversity through the incorporation of habitat creation and enhancement through biodiversity net gain.

**VSC 5:** The temporary nature of the Proposed Development, along with the reversibility of its identified impacts upon decommissioning and the subsequent reinstatement of the site, ensures minimal long-term effects.

**VSC6:** The contribution of the Proposed Development to socio-economic growth and development.

**VSC 1: Contribution to meeting a National/Regional need for BESS and facilitating greater levels of renewable energy generation.**

5.36 The Climate Change Act 2008 (2050 Target Amendment) Order 2019 establishes a legally binding commitment for the UK to achieve a minimum 100% reduction in

greenhouse gas emissions by 2050, relative to 1990 levels ("net zero"). This pathway includes an interim target of a 78% reduction by 2035. A key element in meeting this target will be maximising the efficiency and use of renewable energy production and supply.

- 5.37 To achieve its 'net-zero' goals, the Government has released numerous policy documents and strategies aimed at supporting the deployment of renewable and low-carbon energy sources in suitable locations, as outlined in Section 4.
- 5.38 These policy and strategy documents, including the NPPF, NPS-EN1, the Ten Point Plan for a Green Industrial Revolution all acknowledge the critical national need for the increased deployment of Battery Energy Storage Systems (BESS) to optimise the usable output from intermittent energy sources, such as wind and solar.
- 5.39 BESS is acknowledged as a key component of energy generation, facilitating the effective use of electricity generated from renewable sources in several ways:
- Balancing supply and demand within the electricity network.
  - Reducing or delaying the need for expensive upgrades to network infrastructure, thus supporting the accelerated deployment of renewable energy.
  - Minimising the need to curtail the output of renewable energy generation.
- 5.40 BESS also offers further advantage, including:
- Promoting decentralisation of the electricity grid
  - Lowering energy costs for consumers
  - Enhancing national energy security

#### **Balancing Demand**

- 5.41 In accordance with National policy objectives, the total amount of electricity supplied from fossil fuels has declined substantially since 2012. In the same period the amount of energy generated from renewable sources including wind and solar increased substantially, accounting for 68.2% of all generation in 2024<sup>10</sup>.
- 5.42 Whilst increased levels of generation from renewable energy generation is positive, it is essential that the electricity generation within the system aligns with demand to maintain balance and avoid disruptions like 'black-outs' and 'brown-outs'.
- 5.43 As the proportion of intermittent energy sources (such as wind and solar) in the energy mix continues to rise, coupled with increasing electricity demand driven by factors like the adoption of electric vehicles, balancing the grid becomes more complex.

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<sup>10</sup> [Department for Energy Security & Net Zero \(2024\) - UK Energy Trends \(July to September 2024\)](#)

- 5.44 The increasing frequency of instances where electricity generation exceeds demand highlights the need for system services like BESS, which can store surplus electricity when generation outpaces demand and quickly release it during peak periods or when unexpected strain is placed on the grid (e.g., a temporary reduction in output from a large power station).
- 5.45 In this way, BESS plays a crucial role in maintaining a stable supply of renewable energy to both local and national networks, preventing the loss of otherwise surplus energy.
- 5.46 The National Infrastructure Commission's Smart Power report<sup>11</sup> further notes that as the transition to intermittent and less flexible energy generation sources, such as renewables, progresses, the demand for system services like BESS is anticipated to increase by as much as tenfold.
- 5.47 The Smart Systems and Flexibility Plan<sup>12</sup> identifies that achieving the decarbonisation of the power sector required to meet the Sixth Carbon Budget will require significantly higher levels of system flexibility as renewable energy replaces fossil fuels and the electrification of heat and transportation increases. It is estimated that approximately 30GW of low-carbon flexible capacity will be needed by 2030 and 60GW by 2050 to maintain energy security and effectively integrate high levels of renewable energy generation. As of 2024, there is approximately 5GW of total operational capacity in the UK with approximately 127GW in the pipeline<sup>13</sup>; a considerable 'gap' therefore exists.
- 5.48 The Clean Power Action Plan (2024) similarly recognises the need for flexible capacity. The Plan confirms there to be only 4.5GW of battery storage capacity in Great Britain at present, the majority of which is grid-scale. Based on NESO and DESNZ battery storage growth scenarios for 2030 as identified within the abovementioned report, it is anticipated that 23-27 GW of battery storage to be needed by 2030 to support clean power, a very significant level of increase.
- 5.49 The Infrastructure Commission report confirms that enabling flexibility through systems like BESS would allow the UK to reduce the need for additional power stations, facilitate the integration of more low-carbon electricity at a lower cost, and optimise the use of existing assets within the electricity system.
- 5.50 On a local basis, the Proposed Development would support the operations at Scout Moor Wind Farm and future potential extensions as well as unlocking capacity and balancing demand at Rochdale substation via Croston Close Road Substation in turn supporting growth across a much wider catchment including strategic allocations within Greater Manchester's Places for Everyone Development Plan document and the likes of Atom Valley.

### **Deferring or Avoiding Network Upgrades to Accelerate the Deployment of Renewable Energy Generation**

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<sup>11</sup> National Infrastructure Commission Smart Power Report, page 22

<sup>12</sup> Smart Systems and Flexibility Plan 2021, BEIS (Page 5)

<sup>13</sup> [Renewables UK \(2024\) Battery Storage Capacity in the UK](#)

- 5.51 The transition from fossil-fuel to renewable energy generation, coupled with the rising demand from electric vehicle charging infrastructure, necessitates significant investment in the upgrading and reinforcement of the electricity transmission and distribution networks. However, the consenting and construction processes for these upgrades can be contentious and protracted, often leading to delays in the connection of renewable energy projects to the grid.
- 5.52 To accelerate the integration of renewable energy, the National Grid Electricity System Operator (NGESO) has initiated several 'pathfinder projects,' which encourage and incentivise developers to construct the required supporting infrastructure.
- 5.53 BESS are seen as being important means by which the potential from renewable energy can be maximised. Within the Clean Power 2030 Action Plan it is noted that NESO and DESNZ estimate that between 23-27 GW of new electricity storage in England and Wales is required by 2030 in order to support the scale of renewable energy generation needed to meet net-zero objectives.

#### **Optimising the Use of Electricity Generated from Renewable Sources**

- 5.54 BESS enables the storage of electricity during periods of high generation and low demand, which can then be released during high demand or low generation times. This is crucial for the efficient operation of the grid, as it prevents the curtailment of renewable energy sources like wind and solar when network capacity is limited. By incorporating BESS into the energy system, renewable energy can operate with less curtailment, with excess electricity stored and redistributed when required, thereby maximising the usable output from renewable sources.

#### **Contribution to Lowering Energy Costs for Consumers**

- 5.55 BESS can help lower energy costs for consumers by storing surplus energy during periods of low production costs. According to a report by National Grid<sup>14</sup>, BESS is essential for increasing supply during peak demand periods, thereby reducing costs for consumers. Additionally, the British Energy Security Strategy highlights that enhanced energy storage and flexibility could improve network efficiency, potentially saving £10 billion annually, with these savings passed on to consumers.
- 5.56 The Government's Clean Power 2030 Action Plan states "*By accelerating the switch to domestic renewable electricity sources and accelerating the application of clean electricity to the wider energy system, we will be able to reduce our reliance on fossil fuels faster. This enhances energy security, making the UK less vulnerable to global market disruptions or geopolitical tensions that affect energy prices*". Stability and assurance is also crucial for supporting the growth of businesses by allowing them to plan and invest with confidence.

#### **Contribution to Increased National Energy Security**

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<sup>14</sup> [National Grid \(2022\), A Day in the Life](#)

- 5.57 The deployment and integration of increased BESS capacity will reduce the UK's reliance on fossil-fuel-based power generation, a significant portion of which is imported and subject to price fluctuations driven by macroeconomic factors. In response to these challenges, the Government's 2022 British Energy Security Strategy advocates for the expansion of long-duration electricity storage as a crucial step in transitioning to a higher share of renewable energy generation.

#### **Contribution to Decentralisation of the Grid**

- 5.58 Battery energy storage systems (BESS) are essential for decentralising the grid, allowing energy to be generated and stored in specific local areas where it is needed. Expanding the operational storage capacity reduces reliance on centralised, fossil-fuel-powered facilities, contributing to a reduction in CO<sub>2</sub> emissions and supporting the decarbonisation of the grid. Decentralisation enhances the efficiency of energy generation, minimising the need for centralised facilities to overproduce to compensate for transmission losses over long distances.
- 5.59 The need for new BESS capacity within various locations to balance demand is recognised amongst a range of policies and publications. The Proposed Development would balance demand at a local level assisting Electricity North West to better manage their transmission system.
- 5.60 In summary, the Proposed Development will provide 85 MW of storage capacity, offering a meaningful contribution to addressing the national demand for additional BESS. This development will facilitate the maximisation of renewable energy usage, decrease reliance on fossil-fuel generation, enhance national energy security, and help lower energy costs for consumers.
- 5.61 The Proposed Development is fully aligned with national strategic energy and planning policies, which support the expansion of BESS to enhance energy infrastructure, generation, and decarbonisation efforts.
- 5.62 The Proposed Development is fully aligned with the adopted development plan, which strongly supports and gives significant weight to projects that contribute to more resilient and decentralised energy and heating networks, as well as the reduction of greenhouse gas emissions (RLP Policy ENV8). As such, the development will assist Rossendale in achieving its renewable energy objectives within the Development Plan, as battery storage facilities play a crucial role in decarbonising energy infrastructure.
- 5.63 Additionally, the Proposed Development will provide essential flexible backup generation capacity, enabling a higher reliance on renewable energy within the generation mix. This form of carbon-free energy storage enhances capacity and flexibility within the energy network, supporting the transition to a low-carbon system.
- 5.64 The Proposed Development is vital for ensuring the sustainable delivery of energy to local communities and businesses, particularly during peak demand periods, by facilitating the steady supply of renewable energy to the Grid. It will help maintain power to homes, businesses, and essential services, all of which are fundamental to the region's economy and society.

- 5.65 In conclusion, the Proposed Development will significantly contribute to addressing the national need for battery storage, aligning with local and national planning and energy policies. Therefore, the substantial weight attributed to VSC1 is justified within the planning balance and in the determination of the application.
- 5.66 This approach is supported by appeal decision APP/C3430/W/22/3292837, involving Balance Power Projects Ltd, against South Staffordshire District Council, for a battery storage facility. Further relevant appeal decisions are set out under **Appendix 4**.

**VSC2: Contribution to Addressing Climate Emergency Objectives.**

- 5.67 In September 2019, Rossendale Borough Council declared a 'Climate Emergency' and joined a number of local authorities who declared a motion on climate change. RBC has pledged to work towards ensuring that the Council and the Borough is carbon neutral by 2030.
- 5.68 The Boroughs Climate Change Strategy<sup>15</sup> acknowledges that a key contribution to helping climate change is through:

*'Both a reduction in the overall consumption of energy and the adoption of more renewable energy sources to fulfil our local demand.'*

- 5.69 The Borough's Climate Change Strategy places an emphasis on 'actively' moving to more renewable sources of energy generation.
- 5.70 BESS has been classified as a form of energy generation and will assist the Government in meeting its legal obligation in relation to achieving a 100% reduction in greenhouse gas emissions compared to its 1990 levels, by 2050. It will also assist in ensuring enhanced levels of national energy security.
- 5.71 As of 2019, Rossendale Borough, has continued to exceed renewable energy forecasts with a renewable capacity of 121.9 GWh, representing 22% of Lancashire's total renewable capacity<sup>16</sup>.
- 5.72 The proposed BESS will complement the Borough's existing renewable energy capacity, enhancing system resilience while supplying electricity to approximately 39,000 homes.
- 5.73 The proposed BESS will also save circa 53,481 tCO<sub>2</sub>e each year. Based on the average UK car mileage in 2023 of 7,000 miles and the latest (2024) UK Government emissions factor for average car and fuel (0.2686 kgCO<sub>2</sub>e/mile), this annual GHG saving is equivalent to taking 28,444 cars off the road.
- 5.74 These forecast GHG savings are also equivalent to 87% of the electricity-related GHG emissions of 61,476 tCO<sub>2</sub>e which occurred from within Rossendale Borough in 2022.

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<sup>15</sup> [Rossendale Borough Council - Climate Change Strategy 2020 - 2030](#)

<sup>16</sup> [Lancashire Independent Economic Review \(2021\) - Final Report: State of the Environment: Renewable Technology Input](#)

5.75 Further information relating to reductions in GHG emissions is set out within the Sustainability, Energy and Climate Change Statement prepared by Turley and submitted in support of this application.

5.76 VSC2 attracts **substantial weight** in its own right in the planning balance and determination of the application.

### **VSC3: Absence of non-Green Belt Alternatives**

5.77 There are no sites outside the Green Belt that can accommodate the Proposed Development and which are within a reasonable distance of the designated point of connection to the electricity grid.

5.78 The proposed Battery Energy Storage System (BESS) is required to be situated within 2km of the connection point at the Croston Close Road substation for technical and commercial feasibility reasons. Locating the BESS closer to the connection point is preferable, as it reduces both costs, environmental harm and disruption during construction and transmission losses.

5.79 The preferred site must also meet the following requirements:

- A willing landowner
- Direct accessibility from the highway network to accommodate construction vehicles.
- A relatively level topography to minimise the need for significant cut and fill works.
- Absence of environmental constraints such as designated ecological site, heritage assets or landscape designations
- Not being allocated to other types of development
- An appropriate separation distance from sensitive receptors

5.80 Given that all land within 2km of the point of connection is located within the Green Belt (see Figure 5.1) and taking into account the site selection criteria outlined above, the proposed application site is considered the most suitable, particularly with regard to site access, topography and capable of accommodating the proposed development.

5.81 This point also applies to the requirements of Policy SD2 of the RLP which states that *“All new development in the Borough will take place within the Urban Boundaries, defined on the Policies Map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.”* This Statement clearly sets out why the Site has been chosen and why there are no suitable alternatives within an existing urban boundary.



**Figure 5.1: Map indicating a 2km radius from Croston Close Road electricity substation**

- 5.82 This consideration attracts **substantial weight** in its own right in the planning balance, the calibration of which is supported by the appeal decision at paragraphs 6.54 to 6.61.

#### **VSC4: Contribution to Biodiversity Net Gain**

- 5.83 The Proposed Development will include a quality landscaping scheme, incorporating the planting of 55 no. trees, and the creation of an attenuation pond. This approach is designed to deliver substantial biodiversity benefits both on-site and in the surrounding area. As outlined in the accompanying Biodiversity Gain Assessment, the development will result in no net loss of biodiversity for area-based habitats and a significant net gain for hedgerow and linear habitats, ensuring a positive impact on the local ecosystem.
- 5.84 The contribution to enhancement of biodiversity net gain attracts **moderate weight** in its own right in the planning balance.

#### **VSC5: Temporary and reversible impacts.**

- 5.85 Full planning permission is being requested for the proposed development for a temporary period of 40 years. Upon completion of this period, the development will be decommissioned. All electricity-generating equipment, structures, and associated infrastructure will be removed from the site, with the exception of landscaping features. Following decommissioning, the site is intended to revert to agricultural use/meadowland.

- 5.86 A site restoration and soils management plan would be submitted for the Council's approval prior to decommissioning works commencing. This can be secured by planning condition.
- 5.87 In light of the above, it can be concluded that the effects of the proposed development would be temporary and fully reversible. This consideration holds some weight in favour of granting permission, although the weight is **limited**.

#### **VSC5: Socio-Economic impacts.**

- 5.88 The Proposed Development is supported by a 'Economic Benefit Infographic', prepared by Turley Economics and appended to this Statement (**Appendix 3**) which sets out the wide-ranging benefits that could be realised through both construction and operational phase. In summary, the Proposed Development represents £39m worth of investment, generating 35 gross jobs and 50 net direct jobs during the construction phase and a productivity boost of circa. £4.4m benefitting the regional economy.
- 5.89 During operational phase a range of permanent roles will be supported including within electrical maintenance, energy brokers, technical advisors and consultants.
- 5.90 A fundamental social benefit of the Proposed Development as detailed under VSC 1 is providing energy security and reliability which will increase efficiency of the national grid and ultimately bring down costs for consumers.
- 5.91 The Proposed Development will also unlock a Community Benefit Fund to be spent on local initiatives. Cubico is engaging with the local community as to how the Community Benefit Fund for the project can best support initiatives within the immediate local area. This fund is separate from, and in addition to, the Community Wealth Fund associated with the proposed Scout Moor II Wind Farm expansion. The BESS fund will be ring-fenced specifically for local projects nearest the Site, ensuring targeted support for the surrounding community.
- 5.92 The contribution made by a range of socio-economic benefits attracts **moderate weight** in its own right in the planning balance.

#### **Relevant Appeal Decisions**

- 5.93 There are several recent examples of similar projects in Green Belt and countryside locations where Local Planning Authorities, as well as Planning Inspectors, have given considerable weight to the role of BESS projects in addressing the identified need for such infrastructure. These decisions also recognise the contribution BESS makes to maximising the use of electricity generated from renewable sources and supporting climate change objectives. Additionally, decisions acknowledge the importance of locating BESS facilities in reasonable proximity to the designated connection point to the electricity grid, for both technical and commercial reasons.
- 5.94 A schedule of relevant appeals is set out under **Appendix 4**.

#### **Green Belt Assessment: Planning Balance**

- 5.95 Having identified the relevant policies in the development plan, alongside other material considerations, including the Framework, the decision-maker must assess whether very special circumstances exist to justify granting planning permission for the development. This involves evaluating the weight to be given to each issue to determine the overall balance, in accordance with NPPF paragraph 153 and Section 38(6) of the PCPA 2004.
- 5.96 The development constitutes inappropriate development within the Green Belt. It would lead to definitional harm, a loss of openness and encroachment into the open countryside, which should be given **substantial weight** in the decision-making process.
- 5.97 There would be moderate harm to the purposes of the Green Belt, particularly due to unrestricted sprawl and the objective of safeguarding the countryside from encroachment. This should also be given **substantial weight**.
- 5.98 There would be moderate harm caused to both landscape character and visual amenity which should be provided a commensurate degree of weight in both the planning balance and determining whether VSCs exist.
- 5.99 For very special circumstances (VSC) to be established, the total harm identified must be clearly outweighed by the benefits and material considerations supporting the proposed development. The weight to be given to the VSC is as follows:
- The contribution of the Proposed Development to meeting the national need for BESS carries **substantial weight**;
  - The contribution to addressing climate change and emergency objectives also attracts **substantial weight**;
  - The lack of alternative sites outside the Green Belt similarly carries **substantial weight**;
  - The contribution to enhancing biodiversity holds **moderate weight**;
  - The temporary and reversible nature of the development carries **limited weight**.
  - The socio-economic benefits of the development carry **moderate weight**.
- 5.100 As outlined above, many of the benefits arising from the proposed development are significant and carry substantial weight in their own right. Taken together, the overall package of benefits and VSC clearly and significantly outweighs the harm to the Green Belt and other harms, thereby meeting the policy tests set out in **Paragraph 146** of the NPPF and Policy SD2 of the adopted Development Plan.

## 6. Technical/Environmental Considerations

- 6.1 This section provides a summary of the assessments conducted to evaluate the potential impact of the Proposed Development on relevant technical and environmental receptors.
- 6.2 It also considers the extent to which any residual effects align with or conflict with the policies outlined in the adopted and emerging development plans, the National Planning Policy Framework (NPPF), and other material considerations.

### **Landscape and Visual Impact**

- 6.3 A Landscape and Visual Appraisal Report ('LVA') (prepared by TEP) has been submitted alongside this application and assesses the effect of the Proposed Development on the landscape and visual receptors of the site and its surroundings.
- 6.4 The LVA acknowledges that the Proposed Development will result in the loss of existing agricultural land and a localised increase in urbanising influences within an area that currently comprises small pastoral fields, scattered built form, and overhead powerlines.
- 6.5 However, the LVA also recognises that certain features of the Proposed Development, such as the introduction of new tree planting and hedgerows, will provide screening and mitigate potential visual effects. As the vegetation establishes and matures, views of the built form are expected to become more filtered, allowing the development to visually integrate with the surrounding landscape.
- 6.6 The LVA identifies that the Proposed Development would cause a moderate negative magnitude of adverse change to the site and its immediate surroundings upon completion of construction, which would decrease to low negative magnitude of adverse change after 15 years as the proposed landscape planting matures.
- 6.7 Regarding the impact on notable receptors, the LVIA identifies that the Proposed Development would cause a low negative magnitude of adverse change to the Rossendale Moorland Fringe LCA during years 1 to 15. However, the LVIA concludes that this effect will decrease over time as vegetation matures. As detailed within section 3 of this Statement, new planting comprises meadow and wildflower planting and 55 no. feathered trees.
- 6.8 Additionally, the Proposed Development is assessed to have a localised low negative magnitude of adverse change on National Character Area 36: Southern Pennines. The LVIA further concludes that, given the minor scale of change within the broader context of the NCA, where the development represents a very small proportion, the overall effect would be low.
- 6.9 In overall terms, the effects on landscape character and fabric are expected to range from low to moderate adverse after 15 years and are not considered to be significant.

- 6.10 The effects of the Proposed Development on visual amenity have also been assessed from various viewpoints. Upon completion, the effects are anticipated to range from low to moderate adverse (e.g., from nearby public rights of way (PROW) and adjacent highways). With the maturation of the proposed landscape planting, these effects would reduce to negligible to low adverse.
- 6.11 The occurrence of residual adverse effects to landscape character and visual amenity from any form of development is inevitable. The potential for such associated with energy infrastructure is particularly recognised within national policy. The effects which would arise in this case are neither unusual or out of the ordinary for a BESS development and are, in any event temporary, entirely reversible and infinitely preferable to the devastating effects of climate change.
- 6.12 Overall, the Proposed Development would have no substantial effects on landscape character or visual amenity during its operational lifetime of 40 years. Following this period the Site will be returned to its existing condition thus eliminating any long term harmful impacts. and is considered to comply with paragraph 135(c) of the NPPF and RLP Policy SS and ENV3.

#### **Noise Pollution**

- 6.13 The application is supported by a Noise Impact Assessment (NIA) prepared by TNEI which considers the impacts of the Proposed Development on the closest sensitive receptors. The report identifies these receptors as being residential properties at Higher Moss, Close Nook Farm and Kitchen Cottage.
- 6.14 The NIA has been carried out in line with BS 4142:2014 'Methods for Rating and Assessing Industrial and Commercial Sound' and has appraised a specific BESS product that incorporates acoustics enclosures to each individual BESS unit. The intention of doing so is to limit noise impacts as much practicable and inform a planning condition which sets upper noise limits to advise the detailed design of the Proposed Development at a later stage.
- 6.15 Noise surveys carried out by TNEI advise that the representative background sound level in dB LA90 (15 mins) at all three of the abovementioned properties is 34dB during the day time and 26dB during the night time. BS 4142:2014 provides the following guidance in terms of noise impact associated with industrial and commercial sound:
- A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context
  - A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context.
- 6.16 The NIA in utilising data from the chosen manufacturer appraises the cumulative noise rating of the Proposed Development at each residential property, the conclusions of which are summarised within the below table. The NIA advises that due to the nature of the Proposed Development no tonal character correction has been applied and that impulsivity and intermittency is not considered to be a relevant sound characteristic in this instance to account for within noise modelling.

**Table 6.1: Summary of initial noise impact assessment without context analysis**

| Noise Assessment Location | Proposed Development Noise Rating Level (dB) | Daytime                                                  |            | Nighttime                                                |            |
|---------------------------|----------------------------------------------|----------------------------------------------------------|------------|----------------------------------------------------------|------------|
|                           |                                              | Representative Background Sound Level, dB LA90 (15 mins) | Margin, dB | Representative Background Sound Level, dB LA90 (15 mins) | Margin, dB |
| Higher Moss               | 26                                           | 34                                                       | -8         | 26                                                       | 0          |
| Close Nook Farm           | 33                                           | 34                                                       | -1         | 26                                                       | 7          |
| Kitchen Cottage           | 31                                           | 34                                                       | -3         | 26                                                       | 5          |

- 6.17 As is demonstrated from the above, the Proposed Development would have a low impact on residential receptors, given background levels are typically higher. In terms of nighttime hours, the assessment concludes that the levels could be an indication of adverse impacts depending on context. With regard to context matters considered included the absolute level of the sound, the character and level of the residual sound and the sensitivity of receptors.
- 6.18 In considering these matters, the NIA confirms that nighttime levels given the rural location of the Site are by definition very low, therefore this is not to say that noise in exceedance of these levels are necessarily harmful. Furthermore the NIA notes that the calculated Rating Level assumes that all plant will be operating continually and concurrently and with cooling plant running at anticipated operational capacity, as informed by the BESS plant supplier. In reality, not all cooling plant will be required to run concurrently at all times of the day.
- 6.19 The NIA concludes that detailed considerations of the context clearly indicate that the impacts associated with the operation of the Proposed Development would be less than that found in the initial estimate. Accordingly, the full BS 4142 assessment process concludes that there would be a low impact at all residential receptors.
- 6.20 In summary and as detailed above, the indicated Noise Rating Levels can be effectively secured and controlled through the use of standard planning conditions, ensuring that the Proposed Development does not adversely impact the amenity of nearby existing and future properties. Compliance with these limits and the associated condition terms would demonstrate that the Proposed Development aligns with the requirements of paragraphs 187(e) and 198(a) of the NPPF, as well as RLP Policies ENV1 and ENV6.

### Transport and Access

- 6.21 The application is supported by a Transport Statement prepared by Hydrock to assess the potential impact of the Proposed Development on the surrounding area from a traffic and transportation perspective. The Transport Statement confirms that:
- The additional movements resulting from the Proposed Development during its operational lifetime will be minimal and infrequent, with only 1 visit per month (2 two-way movements per month) envisaged
  - During the construction phase the traffic generated, whilst higher, would not result in a significant impact on the local highway. It is estimated that there would be a maximum of 554 deliveries (1104 two-way movements) made by construction traffic associated with the construction of the BESS over a 12-month period. There is expected to be a daily maximum of approximately 15 HGV deliveries (30 HGV movements) during the initial eight-week period when deliveries will be at their highest intensity.
- 6.22 Based on the traffic analysis conducted, there would be no adverse impact on highway safety, and the residual cumulative impacts on the road network would not be severe. A Construction Traffic Management Plan will be developed in order to control the size, routing and timing of deliveries to Site. The Transport Statement does however provide a Construction Traffic Routing Plan indicating that deliveries will be taken off the strategic road network via the A58 in Rochdale.
- 6.23 The Proposed Development is confined to the southern part of the site, maintaining a sufficient separation distance from the footpath to the north and being separated from the bridleway to the west by existing boundary enclosures. The development will not require the diversion or alteration of existing footways, Public Rights of Way or bridle ways with the exception of the introduction of dropped kerbs at the site entrance.
- 6.24 The Transport Statement confirms suitable visibility splays are achieved at the site entrance, and that sufficient space for manoeuvring is demonstrated on the tracking drawings contained within the report.
- 6.25 Therefore, it is concluded that there are no transport or highway-related reasons that would prevent the granting of planning permission. The Proposed Development complies with paragraph 115 of the NPPF and RLP Policy TR1 and TR2.

#### **Operational Management and Fire Safety**

- 6.26 The application is accompanied by an Outline Fire Prevention Plan, prepared by Hydrock and Indicative Fire Strategy Plan, prepared by Cadmando. This report outlines the fire engineering measures and safety requirements that will be integrated into the design of the proposed BESS development. These measures are aimed at mitigating fire and blast hazards through both preventive and control strategies, in line with NFPA and NFCC guidance.
- 6.27 The Plan outlines three distinct objectives – to prevent fire, to monitor and detect risks and to ensure appropriate mitigation measures are embedded within the Proposed Development. Given the ‘Rochdale envelope’ approach pursued as part of this application, the Applicant’s intention is to prepare a full Fire Prevention Plan at

detailed design stage based on the principles of the Outline Plan, and that this be secured by way of a planning condition.

- 6.28 In firstly considering the prevention of fire, this involves the use of lithium-ion technology certified to relevant standards along with unit-level installation designed in accordance with the latest version of National Fire Protection Association guidelines. The BESS facility will also feature a high-specification cooling system. The latest NFCC 'Grid Scale Battery Energy Storage System planning – Guidance for FRS' has been taken into account whilst designing the indicative layout of the Proposed Development as detailed within the Indicative Fire Strategy Plan, including appropriate separation between BESS units to prevent risk of fire spread.
- 6.29 The BESS facility will also be equipped with a detection and monitoring system which will monitor the performance and status of the batteries themselves, cell temperature, gas detection and heat and smoke detection. The units will be monitored remotely 24/7 and if any issues are detected a multi-step response will be actioned. This includes issuance of a warning, activation of software controls to stop charging and redistribute the electrical load and physical disconnection of the battery at the rack level.
- 6.30 The Plan outlines the fire and blast safety measures designed for worst-case scenarios in which preventive thermal runaway measures have failed. Recommendations including incorporating an extinguishment system and a water tank to support fire fighting appliances. Provision has been made for a water tank of 240,000L as is demonstrated on the Indicative Site Layout Plan.
- 6.31 The Applicant will ensure full engagement with Lancashire Fire and Rescue Service in preparing a full Fire Prevention Plan and subject to compliance with the provisions of the outline Plan provided in support of this application, would mitigate the risk of fire outbreak on Site.

### **Ground Conditions**

#### ***Geophysical Survey***

- 6.32 The application is supported by a Phase 1 Ground Conditions Desk Study prepared by Hydrock. Given the undeveloped nature of the Site and agricultural use, the report considered that it is unlikely that the Site would be classified as Contaminated Land under Part 2A of the EPA 1990. Nevertheless in line with best practice, further investigation of the Site is recommended during detailed design stage in order to ensure the Site is 'development ready' and that no pathways for presently unexpected pollutants are evident. This can be secured by planning condition.
- 6.33 Given the likelihood for peat in the locality, a probing exercise has been undertaken which identifies only three pockets of peat between 30cm and 40cm below the surface and outside of the part of the Site proposed for development. To that extent it is not considered that the Proposed Development would have any adverse impact on peat reserves.
- 6.34 The Proposed Development therefore complies with paragraph 196 of the NPPF and RLP Policy ENV1 and ENV6

### ***Agricultural Land***

- 6.35 National policy aims to protect the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals. The NPPF states that *‘where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality’*<sup>17</sup>
- 6.36 While there is no definition within the NPPF of what constitutes ‘significant development’, schedule 4(y) of the Town and Country Planning (Development Management Procedure (England) Order) (DMPO) 2015 confirms that LPAs *‘must consult Natural England on all non-agricultural applications that result in the loss of more than 20 hectares (ha) of BMV land if the land is not included in a development plan.’*
- 6.37 The Site comprises of 6.2 hectares of Grade 5 (very poor quality) agricultural land and is not BMV and therefore the use of the land to facilitate the proposed development, does not conflict with the provisions of the NPPF.
- 6.38 It is noted that the 3.48ha of existing modified grassland in moderate condition which covers most of the application site is proposed to be enhanced to other neutral grassland in moderate condition in order to secure biodiversity net gain. This type of habitat remains suitable for (albeit lighter levels of managed) grazing, subject to operational BESS requirements.
- 6.39 Furthermore, it is noted that the proposed development will be temporary (40 years) with the batteries and associated infrastructure to be removed from the Site at the end of this period and the Site reinstated.
- 6.40 The Proposed Development therefore complies with paragraph 187(b) of the NPPF and RLP Policy SS and ENV1

### ***Mineral Safeguarding***

- 6.41 The application is supported by a Mineral Resource Assessment prepared by Hydrock due to the Site being located within a Mineral Safeguarding Area. The desk-based assessment advises that whilst the Millstone Grit Group is present on Site and sandstone formations from within the group have been, and are currently used, as a source of building stone from the local area, the need for the mineral reserve below the Site to be safeguarded or worked in advance of development is not warranted.
- 6.42 In the first instance it is not considered that the Proposed Development would lead to sterilisation of the mineral resource as the footprint of the Proposed Development is approximately 90m south of where the sandstone mineral resource (Holcombe Brook Grit, part of the Millstone Grit Group) is mapped by the BGS. As a whole, the site is predominately underlain by Millstone Grit Group (interbedded sandstone, mudstone and siltstone).
- 6.43 In terms of an assessment of the mineral recovery potential, the Site is surrounded by agricultural land and associated farmhouses (buildings within 50m of the site

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<sup>17</sup> Paragraph 187(b) of the NPPF, footnote 65

boundary), and there would be a significantly high sensitivity of impacts associated with working minerals.

- 6.44 The modest scale of the Site also indicates that the extraction of minerals and accommodation of associated extraction equipment would likely prove unviable. Notwithstanding these points there is a clear overriding need for the Proposed Development, which as indicated would only be in situ for a temporary period.
- 6.45 The Proposed Development therefore complies with paragraph 225 of the NPPF, JLMWLP Policy M2 and RLP Policy ENV1, ENV4 and ENV6.

### **Ecology and Biodiversity**

- 6.46 This application is supported by a Preliminary Ecological Assessment (prepared by TEP) which evaluates the potential ecological impacts of the proposed development on any identified habitats or species.
- 6.47 The Preliminary Ecological Assessment (PEA) concluded that, due to the significant separation distance between the site and designated sites, the Proposed Development would not result in any direct or indirect impacts on the identified designated sites. The PEA also indicates that while no notable habitats are present on the site, the grassland habitat could provide suitable foraging and commuting opportunities for several species.
- 6.48 The PEA identifies habitats and species requiring further surveys and specifies when these surveys will be completed. Given seasonal constraints their assessments will be submitted with the planning application upon completion. This includes providing a great crested newt eDNA survey following survey work in April and May and completion of wintering bird surveys which have been ongoing from December 2024 into March.
- 6.49 Aside from the above the report recommends standard protection and avoidance measures to address potential ecological impacts of the Proposed Development during construction and operational phase, in line with national and local policies
- 6.50 The application is supported by a Biodiversity Net Gain Assessment (prepared by TEP) which calculates the Site's baseline habitat value as comprising 21.35 units of principally poor semi-improved grassland. Less than 0.8ha of this will be lost to built form. The extensive Landscape Strategy for the Proposed Development comprises the following:
- 3.48ha of modified grassland in moderate condition, enhanced to other neutral grassland in moderate condition;
  - 1.01ha of new modified grassland;
  - 0.06ha SUDs pond;
  - 55 small trees of moderate condition.

- 6.51 As a result, the Site's biodiversity value will increase to 26.54 habitat units, representing a substantial increase of 24.28%, or more than twice the statutory requirement of 10% biodiversity net gain.
- 6.52 The Proposed Development therefore complies with paragraphs 187 and 193 of the NPPF and RLP Policy ENV4, ENV5, ENV6 and ENV10.

## **Heritage and Archaeology**

### **Built Heritage**

- 6.53 The application is supported by a Heritage Statement (prepared by Turley) which assess the significance of the nearby designated and non-designated heritage assets and the impact of the Proposed Development on that significance. The following designated heritage assets are considered:
- Holcombe Conservation Area
  - Peel Monument (grade II listed building)
  - Fecit Farmhouse with attached stable and shippon (grade II listed building)
- 6.54 The statement advises that in its current form, the Site contributes to the significance of the Holcombe Conservation Area and grade II listed Fecit Farmhouse with attached stable and shippon to a very minor degree as part of their historic rural setting. It does not contribute to the significance of grade II listed Peel Monument.
- 6.55 Based on our assessment of heritage assets with the potential to be affected by the Proposed Development, it is concluded that the significance of the Holcombe Conservation Area and grade II listed Peel Monument would be sustained. Therefore, in respect of these assets, the Proposed Development would meet the objectives of Paragraphs 210, 212 and 219 of the NPPF and the requirements of s.66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 can be satisfied if RBC grants planning permission.
- 6.56 In respect of grade II listed Fecit Farmhouse with attached stable and shippon, it is concluded that a very limited degree of harm would be caused to significance as a result of change within its setting. The level of harm is concluded to be 'less than substantial' in NPPF terms and is at the lowest end of that scale. Accordingly, NPPF Paragraph 215 is engaged which states the following:
- "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*
- 6.57 The Proposed Development presents a range of substantial benefits as demonstrated within section 5 of this Planning Statement including the contribution of the Proposed Development to meeting the national need for BESS, the contribution to addressing climate change and emergency objectives. Lesser public benefits which are still

considered to outweigh the low level of harm are the socio-economic benefits and notable quantum of biodiversity net gain.

- 6.58 The Proposed Development therefore complies with chapter 16 of the NPPF and RLP Policy SS, ENV2 and ENV3

#### **Archaeological**

- 6.59 This application is supported by an Archaeological Desk-Based Assessment prepared by AOC. The assessment identified a low potential for previously unrecorded heritage assets of any period to be present within the site, due to the limited number of recorded archaeological remains within the 1km study area.
- 6.60 The assessment did, however, identify post-medieval agricultural evidence, including an unidentified building, former road, former field boundaries, and remains of the Tollhouse located around the A680. These remains are likely to be considered of low importance due to their commonality in the archaeological record.
- 6.61 The assessment concludes that the design of the proposed development, which concentrates all infrastructure to the south of the site, would not impact any heritage assets located to the north.
- 6.62 The Proposed Development therefore complies with paragraphs 207 and 208 of the NPPF and RLP Policy SS, ENV2 and ENV3

#### **Flood Risk and Drainage**

- 6.63 This application is supported by a Flood Risk Assessment (FRA) prepared by Hydrock. The FRA provides an assessment of flood risk to the development, from on and off-site sources and to off-site receptors arising from the development in accordance with the requirements of the NPPF.
- 6.64 The application site is located in Flood Zone 1 and therefore has a low probability of flooding. A sequential assessment was conducted within the FRA, the Site is considered to be at low risk of flooding from surface water and other assessed sources. The FRA concludes that the Proposed Development is appropriately located, will be sufficiently flood-resistant and resilient, and will not increase flood risk elsewhere, with adequate surface water management measures in place.
- 6.65 Rainwater that comes into contact with the tops of the battery units, inverters, substations, or ancillary units will naturally fall to the ground and permeate through the permeable surfaces towards the proposed 1661m<sup>3</sup> attenuation pond. A pumping station, located to the southwest of the site, will pump surface water through a rising main for discharge into the existing underlying sandstone area to the north of the Site, which will serve as a potential soakaway.
- 6.66 The Proposed Development will not produce any foul waste, eliminating the need for foul drainage connections on the site.
- 6.67 In terms of storage of water and fire-fighting capabilities the Outline Fire Prevention and Management Plan submitted in support of the application confirm that in the

unlikely event of a fire, the Site will be provided with a water supply of at least 1,900 litres per minute for two hours. Measures will be implemented to manage water runoff from firefighting activities to prevent any risk of contamination in accordance with National Fire Chiefs Council guidelines.

- 6.68 Taking all of the above into account it can be concluded that the Proposed Development complies with RLP policy ENV9 and the provisions of chapter 14 of the Framework.

### **Air Quality**

- 6.69 An Air Quality Assessment (prepared by Logika Group) has been submitted in support of this application. The assessment states that the overall air quality effects of the Proposed Development are judged to be not significant based on the conclusions of the screened emission sources.
- 6.70 The Assessment concludes that the Proposed Development is consistent with paragraphs 199 of the NPPF and RLP Policy TR1, as it is appropriately located with respect to local air quality, and its impact on air quality is minimal, with no affect on the compliance with relevant limit values or national objectives.

### **Summary**

- 6.71 The review of the technical assessments outlined above confirms that the scheme has been carefully designed, with any residual effects on identified receptors minimised to the greatest extent possible, remaining well within established acceptable thresholds. There are no technical or environmental factors that would justify withholding the grant of planning permission.

## 7. Summary and Conclusion

- 7.1 This Planning Statement has been prepared by Turley on behalf of Cubico UK Developments Limited to support a full planning application for a Battery Energy Storage System (BESS) with associated infrastructure and landscaping.
- 7.2 The national need for BESS storage projects is clearly articulated in various Government policies and strategies, as well as documents produced by organisations like National Grid. These projects are recognised as a crucial element in achieving climate change targets, reducing electricity costs, and enhancing national energy security.
- 7.3 BESS contribute to achieving these objectives in several key ways, including:
- Storing electricity during periods of high generation and low demand, then rapidly releasing it back into the grid during high demand and low generation, providing essential grid-balancing services to prevent blackouts and brownouts. In this case the Proposed Development would store electricity generated by the Scout Moor Wind Farm and other electricity within the network, releasing when required to meet demand.
  - Balancing supply and demand to maximise the use of electricity generated from renewable sources. In some cases, renewable generation capacity is curtailed or "turned down" due to insufficient network capacity.
  - Creating storage capacity within the network, allowing renewable sources to be integrated more quickly without waiting for upgrades or investment in transmission and distribution infrastructure, which can take months or years to design, consent, and construct. This also helps avoid or defer costly investments in grid infrastructure, potentially lowering energy bills for consumers.
  - Supporting the decentralisation of the transmission and distribution grid, reducing dependence on fossil fuel-based sources of supply and contributing to the reduction of CO2 emissions.
- 7.4 The Proposed Development is designed to be up to 85MW in capacity with the batteries likely to be 2-hour duration, contributing to these national strategic objectives. It would be capable of providing electricity to approximately 39,000 homes. Over the lifetime of the project, it is projected to save a total of 21,088 tCO2e.
- 7.5 It is acknowledged that the Proposed Development is located within the Green Belt, and that it would cause definitional harm, impact the openness of the Green Belt and result in encroachment into the Green Belt. This attracts substantial weight. Moderate harm to landscape character and visual amenity is also recognised. There would also be a low level of less than substantial harm caused in respect of the setting of grade II listed Fecit Farmhouse with attached stable and shippon.

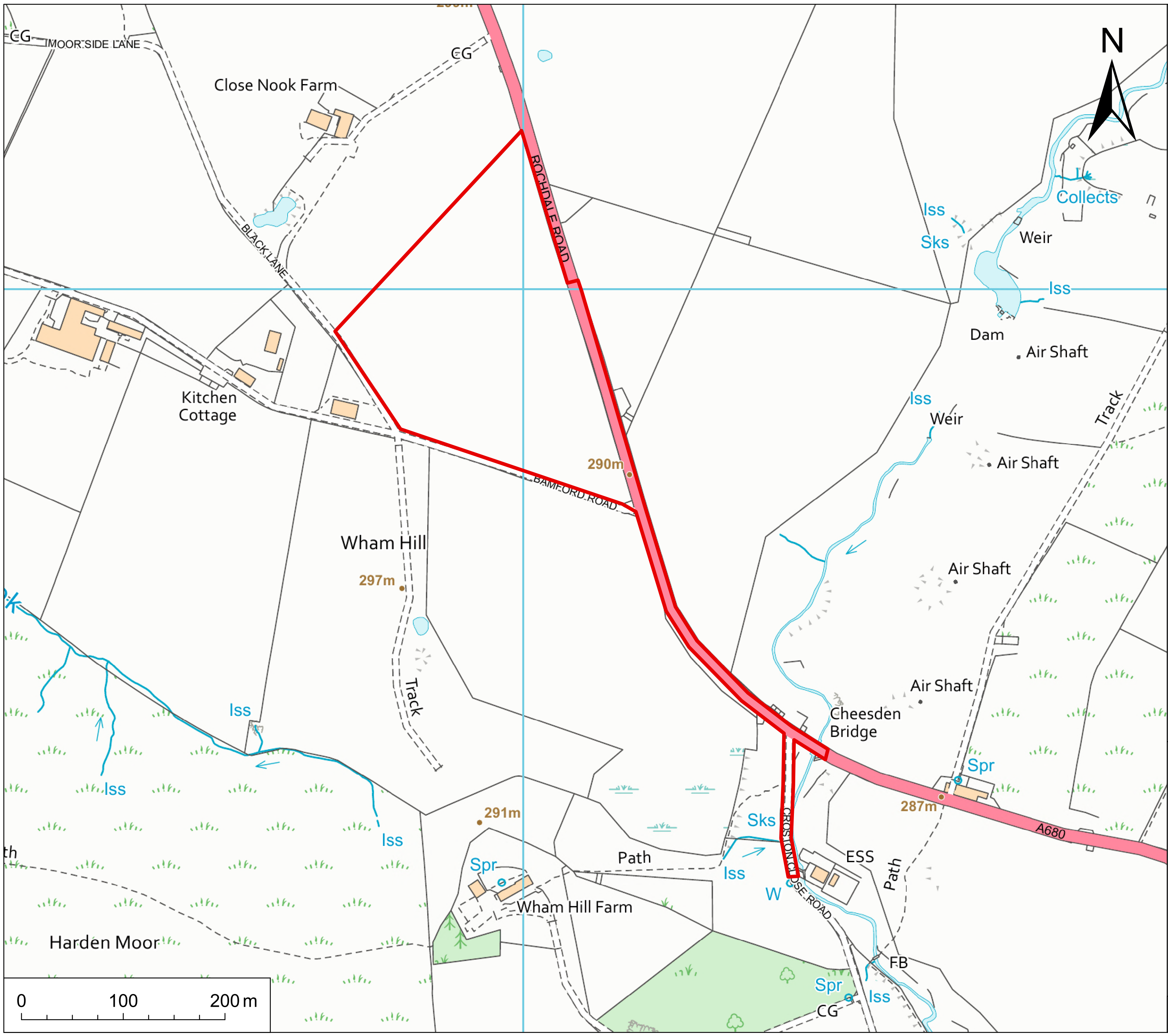
- 7.6 However, there are a range of other important considerations which carry substantial weight and which, in combination, significantly outweigh the identified harm, such that Very Special Circumstances exist making the Proposed Development compliant with the NPPF on Green Belt development. These VSC include the contribution the development makes to the national need for BESS, decarbonising the economy, and the lack of alternative sites outside the Green Belt. Annually, it is projected that the Proposed Development will save a total of 53,481 tCO<sub>2</sub>e.
- 7.7 The importance of BESS in achieving climate change objectives has been recognised in recent appeal decisions, where planning permission was granted for BESS developments in the Green Belt and open countryside. Key factors such as the need for BESS, contributions to reducing greenhouse gas emissions, and the absence of alternative sites have been given significant weight in the planning balance.
- 7.8 The accompanying documentation demonstrates that the Proposed Development has been sensitively designed to avoid harm wherever possible, and to minimise harm through appropriate design and mitigation measures. The technical assessments confirm that any harm arising from the development would be localised and limited, remaining within acceptable thresholds.
- 7.9 That there will be some limited residual effects to the receiving environment is inevitable in all forms of development but particularly those involving energy infrastructure; an inevitability which is recognised in National Policy Statements for Energy EN1, EN3 and EN5.
- 7.10 The limited harm which would arise results from the current international, national and local policy imperatives associated with a shift to a net zero economy.
- 7.11 The limited harm would be temporary and entirely reversible upon decommissioning. It is infinitely preferable to the catastrophic effects which climate change would have on the landscape and biodiversity (for example) if the level of greenhouse gas emissions is not abated through projects such as this.
- 7.12 If the UK is to make significant progress towards meeting the net-zero targets and playing its part in addressing the global climate change target, then the threshold of acceptability for projects **must not** be set at an unattainably high level. This is a material consideration which attracts significant weight as confirmed by the Inspector in a recent appeal for a solar farm.<sup>18</sup>
- 7.13 In light of the above, it is considered that the Proposed Development complies with the Development Plan as a whole and with the NPPF. There are no other policies within the Framework that protect areas or assets of particular importance which would justify refusing the proposed development. The adverse impacts of granting permission do not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole.

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<sup>18</sup> Appeal reference S62A/22/0006 (Land at Berden Hall Farm, Ginns Road, Berden) which concerned a proposal for a solar array (49.9MW) – 18 July 2024.

- 7.14 In accordance with Paragraph 11 of the Framework and Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning permission should be granted without delay.

## **Appendix 1: Site Location Plan**



 Site Boundary

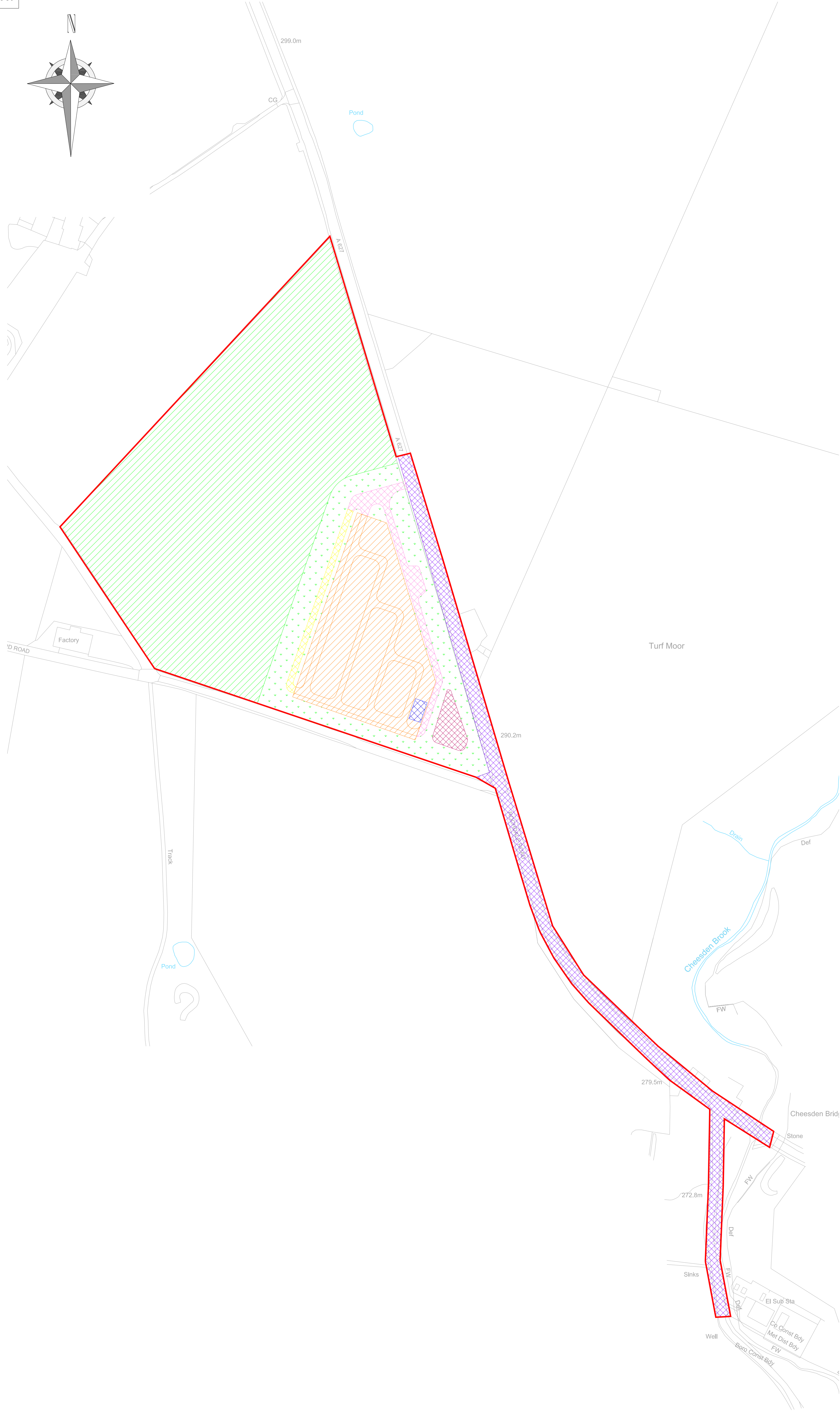
Notes

- Scale 1:2500

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Ordnance Survey 0100031673

Rossendale BESS  
Site Location Plan

## **Appendix 2: Parameters Plan**



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Scaled dimensions must not be taken from this drawing. All dimensions are to be confirmed on site prior to commencement of work

| Revisions: |          |                             |       |           |
|------------|----------|-----------------------------|-------|-----------|
| Revision   | Date     | Revision Notes              | Drawn | Inspected |
| 01         | 27.02.25 | First Issue                 | RR    | PR        |
| 02         | 06.03.25 | Height Table Added          | RL    | PR        |
| 03         | 14.03.25 | Proposed Vegetation Amended | OM    | PR        |
|            |          |                             |       |           |
|            |          |                             |       |           |
|            |          |                             |       |           |
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|            |          |                             |       |           |
|            |          |                             |       |           |

| LEGEND: |                               |  |
|---------|-------------------------------|--|
|         | PLANNING APPLICATION BOUNDARY |  |
|         | WATER COURSE                  |  |
|         | PROPOSED SITE ACCESS          |  |
|         | EMERGENCY ACCESS ONLY         |  |
|         | SUBSTATION                    |  |
|         | BATTERY SITE                  |  |
|         | GENERAL PURPOSE WILD FLOWERS  |  |
|         | MEADOW GRASS MIXTURE          |  |
|         | ATTENUATION POND              |  |
|         | CABLE ROUTE                   |  |

NOTE:  
1m MAX VARIANCE BETWEEN FINISHED GROUND LEVEL AND EXISTING GROUND LEVEL ON PROPOSED PLATFORMS

| Infrastructure Height AOD |             |
|---------------------------|-------------|
| Infrastructure            | Height (mm) |
| 33kV Substation           | 3300        |
| BESS Unit                 | 3000        |
| BESS Transformer          | 3000        |
| 240,000L Water Tank       | 3100        |
| Spare Parts               | 2600        |
| Switchgear                | 2600        |
| AUX Transformer           | 2300        |
| Perimeter Fence           | 2400        |
| CCTV                      | 4000        |

| DEVELOPMENT ZONE      | AREA (HECTARES) |
|-----------------------|-----------------|
| PROPOSED SITE ACCESS  | 0.05            |
| EMERGENCY ACCESS ONLY | 0.11            |
| BATTERY SITE          | 0.85            |
| SUBSTATION            | 0.01            |
| ATTENUATION POND      | 0.06            |
| PROPOSED VEGETATION   | 4.25            |
| CABLE ROUTE           | 0.72            |
| TOTAL                 | 5.99            |

Status:

**PLANNING**

Project:

**Rossendale BESS**  
Rochdale Road, Turn Village

Client:



**Cubico**  
SUSTAINABLE INVESTMENTS

Cubico Sustainable Investments  
Tel: 020 3805 3900  
www.cubicoinvest.com

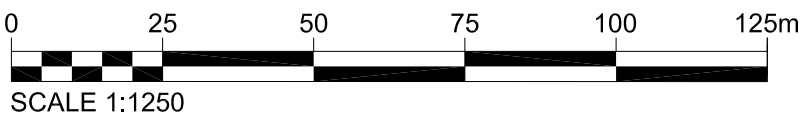
Drawn by:



**CADmando**  
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| Drawing Title:                           |                 |                          |
|------------------------------------------|-----------------|--------------------------|
| <b>Rossendale BESS - Parameters Plan</b> |                 |                          |
| Drawn: RR                                | Checked: PR     | First Issued: 25.02.2025 |
| Project Code: CUB001- PP-01              | Drawing Number: |                          |
| Sheet Size: A1                           | Scale: 1:1250   | Revision: 03             |



## **Appendix 3: Economic Benefit Infographic**

# Economic Impact Infographic

**PROPOSED DEVELOPMENT:** Construction and operation of an 85 MW Battery Energy Storage System (BESS) to connect to a 33Kv substation

**SITE:** Land at Rochdale Road and Bamford Road, Turn Village

## Construction Phase



**£39.0 million**

### Investment

In the North West's green and renewable energy sector



### 35 gross jobs

Full time equivalent (FTE) jobs supported on average during construction (c.18 months)

### Generating 50 net direct, indirect and induced jobs

FTE jobs in the North West, including roles for Rochdale and Rossendale residents

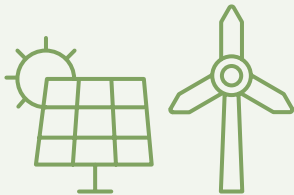


**£4.4 million**

### Productivity boost

GVA<sup>1</sup> contribution to the North West economy during construction

## Operational Phase



### Supporting renewable energy

Such as solar and wind, contributing to the development of a low-carbon energy system and helping meet net zero commitments



### Supporting a range of occupations in the local economy

Across various sectors including electrical maintenance, energy brokers, technical advisors and consultants



### Low on-site environmental footprint

Generating no emissions at the point of use, thus supporting the local and national transition to a net-zero economy



### Lowering energy costs for consumers

Reducing the cost of living, and generating increased demand in the wider economy by reducing curtailment, stabilising energy prices and thwarting price spikes



### Increasing efficiency in the energy system

In terms of costs, land, energy production and speed of deployment, out-performing alternative technologies



### Energy security providing reliability

For national and local grids, preventing blackouts during high-demand periods by balancing demand and generation, preventing frequency loss and regulating voltage

<sup>1</sup> GVA (Gross Value Added) measure the value of output created (i.e. turnover) net of inputs used to produce a good or service (i.e. production of outputs). It provides a key measure of economic productivity. Put simply the GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes.

## **Appendix 4: Relevant Appeal Decisions**

**Land at Minchens Lane, Bramley, Hampshire (Appeal Ref: App/H1705/W/21/389603)**

- 7.15 Planning permission was granted for the development of a BESS within the open countryside (2023) with the Inspector concluding:

*'Battery storage facilities are a key component in the energy facilities of the country, being able to store excess electricity generated by renewable energy facilities when demand is low. It is also clear that the country needs more electricity storage facilities in order to balance demand without restoring to fossil fuel generation. I give sustainable weight to this need.'*

(Para 28 – emphasis added)

*'Locational factors that influence the siting of battery storage facilities include the provision of access to unrestricted network capacity, proximity to a financially viable access to the highway network... the appeal site has all these features and therefore in these respects make it a suitable location for a battery facility. I give substantial weight to these locational factors.'*

(Para 31 - emphasis added)

**Land South Monk Fryston Substation, Selby (Appeal Ref: APP/N2739/W/22/3290256)**

- 7.16 Planning permission was granted for development of a BESS within Green Belt (2022) with the Inspector drawing the following conclusions:

*'The current national position on energy supply is in favour of positive development, and more so in light of international events. The need for a more diverse energy system is becoming more apparent.'*

(Para 25)

*'Energy storage is seen as a significant part of the strategy, and battery units such as this are seen as a positive in terms of being renewables and produce negligible emissions in line with commitments with regards to Net-Zero emissions. As a result, significant weight can be attached to this matter.'*

(Para 26 – emphasis added)

*'It is also apparent that there is a clear and pressing need to address the energy strategy issues facing the country, hence the need for the proposal (para 31) [...] These considerations, collectively, carry great weight and I conclude that they amount to very special circumstances sufficient to outweigh the harm to the Green Belt by reason of inappropriateness and the effect on openness.'*

(Para 32 – emphasis added)

**Little Holt, Hook (Appeal Ref: APP/N1730/W/17/3167123)**

- 7.17 Planning permission was granted for a BESS (2017) within the open countryside with the Inspector concluding:

*'I give **significant weight** to the purpose of the development and the more recent policies in the Framework with which it would accord. These include one of the Framework's core principles, and that decisions should recognise that even small-scale project provide a valuable contribution to cutting greenhouse gas emissions.'*

(Para 12 – emphasis added)

**Land West of Wolverhampton, South Staffordshire (Appeal Ref: APP/C3430/W/22/3292837)**

- 7.18 Planning permission granted for a BESS (50MW) within the Green Belt (2022) with the Inspector drawing the following conclusions:

*'The policy support for renewable development and associated development given in the Framework is caveated by the need for the impacts to be acceptable or capable of being made so. Nevertheless, the energy storage benefit of the proposal must be accorded **Substantial Weight**.'*

(Para 14 – emphasis added)

*'Additionally, whilst the proposed development would be located at the site for number of years, it is reversible and capable of being removed from the site.'*

(Para 17)

*'Therefore, in my judgement the environmental benefits of the proposal and the fact that the impacts can be made acceptable are sufficient to outweigh the harm to the Green Belt. Consequently, the very special circumstance necessary to justify the proposal do exist...'*

(Para 18)

**Land at Rawfield Lane, Fairburn, Selby (Appeal Ref: APP/N2739/W/22/3300623)**

- 7.19 Planning permission granted for BESS within the Green Belt (2022) with the Inspector making the following observations:

*'The Future Energy Scenarios Report 2022 updates the requirement for battery storage capacity from 13GW in the 2021 Future Energy Scenarios Report to 20GW by 2030. Hence, I give the need for equipment very significant weight.'*

(Para 29 – emphasis added)

*'I acknowledge that this is not in itself a renewable energy project and therefore paragraph 151 of the Framework does not apply. However, without the move to renewable energy generation, there would not be a need for the development due to the inherent vagaries of harnessing energy through renewable technology [...] I am satisfied therefore that the proposal would support the transition to a low carbon future in a changing climate through supporting renewable and low carbon energy and associated infrastructure in accordance within paragraph 12 of the Framework.'*

(Para 137 – emphasis added)

*'I give **very substantial weight to the lack of alternative sites** to deliver the high level of benefit, most importantly, in there required time frame to help to deliver the National Grid and UK's ambitious net zero targets.'*

(Para 38 – emphasis added)

**Land at Park Farm, Gillingham (Appeal Ref: APP/D1265/W/22/3300299)**

- 7.20 Planning permission was granted for the development of a BESS on land within the countryside. In granting approval, the Inspector expressed the following views on the weight to be given to the contribution the scheme would make in addressing the national need for such infrastructure:

*'For many years there have been a series of policies, statements and legal obligations which all seek to encourage renewable energy developments where they are appropriate [...] It is clear that decarbonisation will rely very heavily on wind and solar power projects, and that the national need is significantly greater than the capacity of current projects. **In light of the local and national imperative summarised above related to the provision of renewable energy, this matter weighs very heavily in favour of the proposal.'***

(Para 92 and 93)