REDDITCH BOROUGH COUNCIL

PLANNING COMMITTEE 28th May 2026

Planning Application 25/00888/FUL

Installation of Battery Energy Storage System (BESS) including access tracks and service roads, underground cable route, on-site substation, other ancillary electrical infrastructure, security fencing and CCTV, on-site car parking, drainage and water supply features, temporary construction compound, new landscaping and biodiversity enhancements.

Land At Wheaten Hill Farm, Astwood Lane, Astwood Bank, Worcestershire

Applicant: **Boom Developments Limited**
Ward: **Astwood Bank And Feckenham Ward**

(see additional papers for site plan)

The case officer of this application is Mr Paul Lester, Planning Officer (DM), who can be contacted on Tel: 01527 881323 Email: paul.lester@bromsgroveandredditch.gov.uk for more information.

1. Site Description

1.1 The application site is located at Wheaten Hill Farm, Salt Way, Feckenham, within a predominantly rural area to the south of Redditch. The site lies wholly within the West Midlands Green Belt.

1.2 The wider landholding extends to approximately 32 hectares of agricultural land, with the proposed Battery Energy Storage System (BESS) occupying an area of approximately 4.74 hectares. The land is currently in arable use and is divided into several fields bound by established hedgerows. The site is gently undulating, sloping generally from east to west, and reflects the wider rural landscape character of the area.

1.3 The site is located approximately 1km east of Astwood Bank, 2km west of Feckenham, and around 2km south of Redditch town centre. The surrounding area is characterised by open farmland with scattered residential properties and farmsteads. Existing energy infrastructure forms part of the context of the site, including overhead power lines and the Feckenham electricity substation located to the west.

1.4 The site lies outside any nationally designated landscape or ecological designation and is located entirely within Flood Zone 1, the lowest category of flood risk. There are no designated ecological sites within the site boundaries. The nearest Sites of Special Scientific Interest (SSSI) are located some distance away and are not directly affected by the proposal.

1.5 A public footpath crosses the application site, running generally north-south through the central part of the site and providing local walking connectivity through the surrounding farmland.

1.6 A number of designated heritage assets lie within the wider setting of the site, including listed buildings and a Scheduled Monument approximately 440 metres to the north. There are no heritage assets located within the site itself.

1.7 In agricultural terms, the land is not classified as Best and Most Versatile agricultural land, being predominantly Grade 3b or lower.

2. Proposal Description

2.1 The application seeks full planning permission for the construction and operation of a Battery Energy Storage System (BESS) on land at Wheaten Hill Farm, together with associated infrastructure and ancillary works, for a temporary period of 40 years.

2.2 The proposed development would comprise a 400MW grid-scale BESS, capable of storing and discharging electricity for a period of between 2 and 4 hours, to support the electricity network and the integration of renewable energy generation. The main development compound would extend to approximately 4.74 hectares.

2.3 The proposed development would comprise the following equipment housed within a fenced compound

- Battery storage units measuring approximately 6.1 m (L), 2.4 m (W) 3.2 m (height) positioned on concrete piers measuring 0.3 m (H).
- Power Conversion Systems (PCS) to serve battery storage units measuring approximately 6.5 m (L), 2.0 m (W) and 3.2 m (H) positioned on concrete piers measuring 0.3 m (H)
- 400kV substation
- Associated underground cabling - 400kV cable between onsite and 400kV substation and offsite point of connection at Feckenham
- Substation buried underground within trench measuring approximately 1.5m wide and 1.6m deep.
- Customer substation and foundations measuring approximately 3.0m (L), 2.2m (W) and 3.2m (H).
- Local Supply Transformer and foundations measuring approximately 6.0m (L), 2.4m (W) and 2.7m (H).
- Storage container and foundations for spare parts measuring approximately 6.0m (L), 2.4m (W) and 3.2m (H).
- Onsite drainage engineering including headwalls, surface water drains, filter drains, perforated drains.
- Permeable surfacing for access tracks.

- Impermeable surfacing for internal service roads, BESS and 400kV substation compound areas.
- Palisade fencing and gates approximately 2.4m in height.
- CCTV and emergency lighting mounted on posts measuring approximately 4.0m in height.
- Water tank measuring approximately 2.5m (H) by 7.0m (diameter)
- Earth bund measuring approximately 3.0m in height.
- Attenuation basin measuring approximately 1.7m in depth.
- Landscape and ecological enhancements including shrub, tree and hedgerow planting.
- Temporary construction compound, laydown area and welfare facilities to be provided during construction.

2.4 Vegetation clearance would be limited to that necessary to implement the development, with the majority of existing boundary hedgerows retained where possible. New planting is proposed to provide visual screening and ecological enhancement.

2.5 Vehicular access to the site would be taken from Salt Way, with an additional emergency access from Astwood Lane. The point of connection (PoC) for the scheme would be at the Feckenham Substation, located approximately 1km west of the application site. The connection would be achieved via underground cabling from the site to the substation. No overhead lines or pylons are proposed.

2.6 The development is proposed on a temporary basis, with conditions requiring the removal of all structures, plant and equipment at the end of the approved period and the restoration of the land to its former agricultural condition.

3 Relevant Policies:

Borough of Redditch Local Plan No. 4

Policy 1: Presumption in Favour of Sustainable Development
Policy 2: Settlement Hierarchy
Policy 5: Effective and Efficient use of Land
Policy 8: Green Belt
Policy 11: Green Infrastructure
Policy 15: Climate Change
Policy 16: Natural Environment
Policy 17: Flood Risk Management
Policy 18: Sustainable Water Management
Policy 19: Sustainable Travel and Accessibility
Policy 20: Transport Requirements for New Development
Policy 22: Road Hierarchy
Policy 36: Historic Environment

Policy 37: Historic Buildings and Structures
Policy 39: Built Environment
Policy 40: High Quality Design and Safer Communities

Others
NPPF – National Planning Policy Framework 2024
NPPG – Planning Practice Guidance
High Quality Design SPD
Worcestershire Local Nature Recovery Strategy

National Government Policy regarding Energy
National Policy Statement EN-1 (Overarching National Policy Statement for Energy) 2005
National Policy Statement EN-3 (For Renewable Energy Infrastructure) 2025

4 Relevant Planning History

None

5 Planning History in the vicinity of the site

5.1 Within the vicinity of the application site one Battery Energy Storage System (BESS) has been previously approved at Planning Committee on at land south of Astwood Lane, which is immediately east of the Feckenham National Grid Substation.

21/00195/FUL	Construction of a Greener Grid Park Comprising energy storage and grid balancing equipment, along with associated infrastructure, landscaping and access.	Approved 21.02.2022
24/00387/FUL	Proposed underground cable to connect Feckenham Greener Grid Park (approved under 21/00195/FUL) to Feckenham Substation	Approved 14.10.2024

5.2 Redditch Brough Council are currently assessing a second BESS scheme under application 25/00628/FUL at Land South Of Salt Way, The Saltway, Feckenham, Worcestershire for the installation of Battery Energy Storage System (BESS) with access and associated infrastructure.

5.3 This application will be considered at a future planning committee meeting.

5.4 Reference has been made in the supporting information to application refence 23/00417/FUL at Land At Astwood Lane, Feckenham for the Construction and

operation of a battery energy storage compound, fencing, CCTV, access and associated infrastructure. This application was withdrawn on 6th June 2025.

5.5 Furthermore, reference is also made to Saltway Farm BESS (24/01057/SCOP). There is no planning application being considered relating to this site.

6 Consultations

Worcestershire Archive And Archaeological Service
Given the archaeological potential of the site I recommend pre determination investigation ' a sample of trial trenching ' prior to determination. Should the application be determined without further pre determination investigation a programme of archaeological works should be secured and implemented by means of a suitably worded condition attached to any grant of planning permission. This should comprise the following.

• The submission of a programme of archaeological work
• Written scheme of investigation

Conservation Officer
The close proximity of the entrance way to the site to the Mutton Hall Farm (Grade II Listed) and potentially some partial distant views of the tops of the BESS units would detract from the setting of the listed building and in turn cause some harm to its significance. This harm would be at the lower end of less than substantial harm. Reinforcing the boundaries as suggested with additional trees, although these will take some years to grow to a height sufficient to obscure the units, and the infilling of gaps in the hedgerow will mitigate some of this harm. Although the small amount of harm due to the construction of the access road would still exist. As the harm is less than substantial, it will, as required by paragraph 215 of the NPPF, need to be weighed against the benefits of the scheme, as part of the wider planning balance.

Environment Agency
The Environment Agency have not objected to the application and have made comments on the proposal as follows:

The Agency advises that the site is underlain by a Secondary B aquifer and, while not located within a Source Protection Zone, there may be private water supplies in the area that should be considered. The site lies within Flood Zone 1; however, there is an unmodelled ordinary watercourse along the south-eastern boundary, the management of which should be addressed to the satisfaction of the Lead Local Flood Authority.

The Environment Agency highlights that the principal environmental risk associated with Battery Energy Storage Systems relates to abnormal or emergency events, particularly fire, and the potential for contaminated firefighting water to pollute surface water or groundwater. It is therefore essential that appropriate mitigation measures are secured to

provide multiple levels of protection, including adequate containment of firewater runoff, sealed drainage arrangements, and pollution prevention measures.

The Agency recommends early engagement with the Fire and Rescue Service and reference to National Fire Chiefs Council guidance in the design and layout of the site, including emergency access and firefighting water provision. Subject to appropriate conditions securing these matters, the Environment Agency raises no objection to the proposed development.

Worcestershire Highways – Redditch
No objection subject to conditions

- Site Access Layout
- Vehicular Visibility Splays
- Highway Condition Survey
- Cable Route Assessment Report
- Wheel Washing Facilities
- Construction Traffic Management Plan

WRS - Contaminated Land
No objection subject to unexpected contamination condition

WRS - Noise
No objection
The submitted noise impact assessment predicts that noise from the proposed development and the cumulative noise from it and surrounding future developments, should not adversely impact the nearest sensitive receptors. Therefore, I have no objection to the application in terms of noise. When the site design has been finalised, the applicant should submit the sound emission specifications for the Battery Unit, the MVS unit and the Grid Transformer for approval.

WRS - Air Quality
No objection

Hereford & Worcester Fire And Rescue
- A comprehensive risk management process should be undertaken for the facility.
- This process should identify hazards and risks, and inform a robust Emergency Response Plan.

Following the initial response, a meeting was held between, HWFRS , the Council and the applicants team to discuss the proposal.

Following this meeting HWFRS confirmed that they would address the outstanding issues by conditioning the application.

National Grid
National Grid Electricity Transmission have no objection to the proposal provided:

- The statutory clearances from our conductors indicated on the attached profile drawings are maintained at all times, including during construction. Clearance to ground level and road surface level are defined in the table on the right-hand side.
- A minimum of 15m stand off from our tower is maintained to any buildings, structures (including drainage) and drainage basins.
- There are no conflicts with any deeds of easement that we may have covering our overhead lines that are routed through the site.
- Suitable access (including vehicular access) is not restricted.

Worcestershire County Council Countryside Service
• Surface Reinstatement
Any PRoW surfaces disturbed during the development must be reinstated to their original condition or to a specification agreed in advance by this department. This should not be taken as permission to disturb the surface intentionally.
• Work undertaken to carry out the development should not obstruct the footpath at any time. However, if public safety demands a temporary closure, application should be made at least 6 weeks in advance, unless an emergency situation arises, by contacting PROWclosures@worcestershire.gov.uk.
· The width of the PROW cannot be reduced, currently it has no statutory width, thus a minimum width of 2.0 metres is deemed dedicated to the public on open ground, 2.5 metres when bordered on one side and 3.0 metres when bordered on both sides.

Ecology (Thompson Environmental Consultants – Redditch BC appointed ecology consultant)

- No objection to updated BNG information.
- Following receipt of an GCN Survey, this document is considered sufficient to address the comments raised in the original response. The LPA should note the recommended conditions in the original response.

Landscape Comments (Places Services– Redditch BC appointed Landscape consultant)
Based on the recommendations of the LCA/LCT and the management guidance within, the proposals will have a negative impact on the character and sensitivities of this landscape. The impact on the sites character and visual amenity will also be negative, introducing urban features and traffic movement into what is a sensitive landscape setting.

Visually, the impact of the proposals is reduced due to the surrounding topography of the site. Views to the site are largely restricted to the PRoW which pass though or run adjacent to the site. However, we disagreed with the judgements made within the LVApp which conclude that the impact on these close-up views can be reduced with mitigation, especially considering the extent of the proposed Landscape Strategy. We have

recommended that additional viewpoints are assessed to provide a greater understanding of the development impact and how this impact can be suitably mitigated.

The submitted Landscape Strategy fails to demonstrate a clear link between the LVApp and the Landscape Character Area management principles. The Landscape Strategy misses a number of opportunities to reinstate/reinforce the existing hedgerow, introduce new planting- in keeping with the LCA and provide greater levels of screening.

North Worcestershire Water Management
No objection subject to conditions

- Pre commencement drainage condition
- Management plan detailing future maintenance responsibilities for SuDS assets

Natural England
No objection - subject to appropriate mitigation being secured

Natural England considers that without appropriate mitigation the application would:
• damage or destroy the interest features for which Wylde Moor Feckenham Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:
• Mitigation regarding water contamination/pollution
• Mitigation regarding surface water drainage system

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures. A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted.

Historic England
In this case Historic England are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers.

Wychavon District Council
No comments received to date

7 Public Consultation Response

Site Notice erected 20.06.2025 expired 14.07.25
Press Notice published 09.06.25 expired 30.06.25
Neighbour consultation letters have been sent to 21 properties 09.06.25 expired 03.07.25

Feckenham Parish Council (Neighbouring Parish)

Feckenham Parish Council are not a statutory consultee, however due to the proximity to the application site were notified of the planning application.

Feckenham Parish Council objects to the proposal on the following principal grounds:

- Green Belt Harm: The site is located within the designated Green Belt. The Parish Council considers the proposal to constitute inappropriate development, resulting in harm to the openness, permanence and rural character of the Green Belt. It is argued that the site does not meet the definition of “grey belt” land and that approval would undermine Green Belt policy and set an undesirable precedent.
- Lack of Demonstrable Need: It is contended that there is no unmet national or regional need for additional Battery Energy Storage Systems (BESS). Reference is made to Government data and the Clean Power 2030 Action Plan, which the Parish Council considers demonstrates that existing and consented BESS schemes already exceed the identified capacity requirements for the West Midlands region.
- Planning Policy Compliance: The Parish Council considers that the proposal conflicts with national and local planning policy, including the National Planning Policy Framework and the Redditch Borough Local Plan, particularly in relation to Green Belt policy, settlement hierarchy and sustainable development principles.
- Energy and Climate Change Claims: Objection is raised to the applicant’s characterisation of the development as “renewable” or “low-carbon”, with the Parish Council arguing that BESS does not generate energy and provides only short-term storage, limiting its contribution to climate change objectives.
- Landscape and Character Impact: Concern is expressed regarding the introduction of a large-scale, industrial form of development into an open, rural landscape, with potential adverse effects on the character and setting of the surrounding countryside and the historic village of Feckenham.
- Fire Safety and Environmental Risk: The Parish Council raises concerns about the risk of fire associated with large-scale lithium-ion battery storage, including potential impacts on land, watercourses and public safety, and questions whether sufficient detail has been provided to demonstrate that fire risks can be adequately managed.
- Cumulative Impact and Precedent: It is argued that approval could encourage further similar proposals in the area, leading to cumulative harm to the Green Belt and rural environment.

On this basis, Feckenham Parish Council requests that planning permission for application to be refused.

Further objection has been received Feckenham Against Battery Storage Systems & Solar (FABSSS).

FABSSS objects to the proposal and requests that the application be suspended, raising the following main concerns:

- Ambiguity over Capacity
  It is argued that the application is fundamentally unclear and potentially misleading. While the Planning Statement describes the proposal as a 400MW BESS, the technical documents (including the Fire Verification and Battery Safety Management Plan) refer to 336 battery units of 2.5MW each, equating to an installed capacity of approximately 840MW. FABSSS contend that this discrepancy renders the application invalid.
- Environmental Impact Assessment
  FABSSS state that the Secretary of State's screening opinion confirming that an EIA is not required applies only to a 400MW scheme. If the true capacity is higher, it is argued that the screening opinion would be invalid and a full Environmental Impact Assessment would be required.
- Fire Safety and Public Safety
  The objection raises concerns that insufficient and inconsistent information has been provided regarding battery chemistry, fire testing, fire suppression measures and emergency response. FABSSS consider that fire risk cannot be properly assessed without clarity on the final specification of the BESS units.
- Environmental Risks
  Concern is expressed regarding potential impacts associated with a larger-scale facility, including waste heat, firewater runoff, pollution of nearby watercourses, toxic smoke plumes, and long-term battery waste and recycling impacts.
- Consultation and Transparency
  It is argued that meaningful public consultation cannot take place while the scale and specification of the development remains unclear, and that all fire safety documentation should be made publicly available to allow independent expert review.

On this basis, FABSSS request that the application be suspended, that unambiguous capacity and specification details be submitted and controlled by condition, and that a full Environmental Impact Assessment be required.

A further 5 objections have been received

- Inappropriate development in the Green Belt / open countryside
- Severe landscape and visual harm from large-scale industrial infrastructure
- Noise impacts from 24/7 operation affecting residential amenity

- Fire, explosion and public safety risks associated with lithium-ion batteries
- Lack of a detailed emergency response and fire mitigation strategy
- Inadequate access for emergency vehicles on narrow rural roads
- Scale and intensity of development considered excessive for the location
- Insufficient and slow-maturing landscaping mitigation
- Traffic and highway safety concerns, particularly during construction
- Close proximity to homes, schools, heritage assets and public rights of way
- Flood risk and water contamination fears, including firefighting runoff
- Loss of agricultural land and cumulative industrialisation of the area
- Questioning of need and justification for the development
- Lack of community engagement

Other issues which are not material planning considerations have been raised but are not reported here as they cannot be considered in the determination of this application.

Members are aware that the complete objections can be viewed on public access by using this link https://publicaccess.bromsgroveandredditch.gov.uk/online-applications/

8 Environmental Impact Assessment (EIA)

8.1 The aim of the EIA Regulations is to ensure that major projects likely to have significant impacts on the environment are subject to an EIA, so that these impacts are fully assessed and understood before planning permission is granted. Development proposals of varying types are categorised in the EIA Regulations as either Schedule 1 or Schedule 2 development, depending on the nature and scale of the proposal. Development proposals within the former category must always be subject to an EIA, while those within the latter category require a determination as to whether they are likely to have significant effects on the environment where one of the threshold criteria is exceeded.

8.2 In addition, where development falls within Schedule 2 and is located within a sensitive area, a screening opinion is required to determine whether the proposal is likely to have significant environmental impacts, even if the relevant thresholds are not exceeded.

8.3 The Local Planning Authority issued its screening opinion on 3 December 2024, confirming that the development constituted EIA development.

8.4 However, following a request by the applicant's agent for a screening direction from the Secretary of State, it was confirmed on 27 February 2025 that the proposed development the proposal is unlikely to result in significant environmental effects, either alone or cumulatively. Therefore, an Environmental Impact Assessment (EIA) is not required.

9 Community Engagement

9.1 The Planning Statement and accompanying Statement of Community Involvement (SCI) outline a programme of community engagement undertaken by the applicant prior to the submission of the planning application. Engagement commenced in October 2024 and was intended to inform local residents, parish councils and elected representatives of the emerging proposals, and to provide opportunities for feedback.

9.2 Local parish councils were contacted at an early stage and offered briefings on the proposal. Local ward members and the Member of Parliament were also invited to engage with the project and attend consultation events.

9.3 Public consultation was carried out through a range of methods, including a public exhibition event held in November 2024 at a local venue. Information boards explaining the site context, the nature of the proposed BESS development, landscape mitigation and environmental considerations were made available, and members of the project team were present to answer questions. The event was attended by local residents.

9.4 In addition, consultation letters and brochures were distributed to nearby households and businesses, and a project website was established to provide accessible information about the proposals, including exhibition materials and a means of submitting comments directly to the applicant.

9.5 The Planning Statement and SCI confirms that feedback received through the consultation process was reviewed and taken into account in the evolution of the scheme, particularly in relation to layout, landscape mitigation and environmental enhancements. A separate Statement of Community Involvement accompanies the application and provides further detail on the consultation process and the responses received.

9.6 Overall, it is considered that appropriate pre-application engagement was undertaken by the applicant. This is in line with the Framework, which emphasises early, proactive and meaningful community engagement in the decision-making process.

9.7 Following the submission of the planning application, the relevant public consultation process has been completed by the Local Planning Authority.

Assessment of Proposal

10 Principle of Development

10.1 Section 2 of the Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. To achieve this the planning system has the three overarching objectives of economic, social, and environmental elements which are interdependent and need to be pursued in mutually supportive ways.

10.2 At the heart of the Framework is a presumption in favour of sustainable development which for decision making means that development proposals that accord with the Development Plan should be approved without delay, but where the Development Plan is absent, silent or relevant policies are out of date, LPAs should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. Paragraph 11 of the Framework does includes a caveat (footnote 7) stating the presumption in favour of sustainable development does not apply where specific policies provide a strong reason for refusing the development, which includes development within Green Belt, designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75).

10.3 The application site is located on land outside of a settlement hierarchy outside of the settlement hierarchy outlined in Policy 2 Settlement Hierarchy.

10.4 The proposed development is intended to serve as infrastructure supporting the National Grid network and therefore, it is considered the relationship with National Grid infrastructure (in this case the Feckenham substation) is the determining factor in identifying an appropriate location for this type of development. It is acknowledged that the location of a battery storage site is unlikely to be accommodated within designated settlement areas where the availability of land is typically more constrained. However, the requirement to be near National Grid infrastructure does not completely discount the possibility of a settlement location or serve to demonstrate a countryside location is inherently essential.

10.5 Policy 15 Climate Change focuses on how the Council will deliver viable low carbon climate resilient developments. Specifically, the policy goes on and states that the Council will support low carbon energy generation schemes when adverse impacts are addressed satisfactorily. The Policy mainly relates to ensuring that developments incorporate measures to mitigate against climate change. The Local Plan was written at a time when large scale renewable energy development such as this type of infrastructure was not commonly being dealt with by local planning authorities.

10.6 Section 11 of the Framework ‘Making effective use of land’ sets out that planning policies and decisions should promote an effective use of land including making as

much use as possible of previously developed or brownfield land (paragraph 124). Also that policies and decisions should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and supporting opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land" (Framework paragraph 125(c)). As set out elsewhere this site falls wholly within the Green Belt and as such there are no brownfield regeneration benefits arising from this proposal which can be given positive weight in the overall planning balance.

10.7 At national level, whilst there is no specific policy for BESS development in the Framework, there are policies for mitigating the impacts of climate change and specifically relating to the development of renewable energy projects. These are set out in the Framework in Chapter 14: Meeting the challenge of climate change, flooding and coastal change with Paragraph 161 confirming that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. There is a strong strategic policy framework which supports renewable and low carbon development proposals. The Framework also confirms in paragraph 168 that applicants are not required "*to demonstrate the overall need for renewable or low carbon energy"*.

10.8 The Planning Policy Guidance on Renewable and Low Carbon Energy provides further guidance on considering and determining developments for renewable energy. As established earlier the PPG carries the same weight in decision taking as the Framework.

10.9 The PPG contains a section specifically dealing with battery energy storage systems setting out that:

Electricity storage can enable us to use energy more flexibly and de-carbonise our energy system cost-effectively – for example, by helping 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.

10.10 The PPG does not provide any specific information on battery storage in terms of siting stating that there are no hard and fast rules on how authorities should identify suitable areas for renewable energy. It advises local authorities to consider potential impacts of developments on the local environment and the views of local communities.

10.11 Whilst developers and LPAs are encouraged in the PPG to consult their local fire and rescue service on planning applications for BESS schemes, it should be noted that fire and rescue services are not statutory consultees. Updates to the PPG refer to guidance on grid-scale BESS by the National Fire Chiefs Council and

comments received from the Fire Service in relation to this application are covered under a separate heading in this report.

10.12 There are a number of Government documents that reference Climate Change and Energy requirements – the documents are noted below. The Clean Power 2030 Action Plan (Dec 2024) is a recent Government document, which provides significant information on the unmet need for power in the UK.

10.13 In 2019 Redditch Borough Council and many other Councils across the country declared a climate emergency. The Council made a commitment to reduce carbons emission by 50% by 2030 and achieve Net Zero by 2040[1]. A Carbon Reduction Strategy and Action Plan has been produced by the Council with the latest version 5 being published in October 2022[2]. Within this document one of the actions and measures is to: "*Review Local Plan where there is particular reference to renewables /provision for renewables in the future or heat networks*".

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10.14 National Grid's Future Energy Scenarios Report (2024) - the report notes there is currently 4.7GW of operational battery storage in the UK, with an expected 36GW of energy storage requiring installation by 2050 in a best-case scenario attainment of net zero. Electricity storage capacity is required to increase in all scenarios to ensure that demand can be met reliably in peak times as an increasing proportion of the UK's electricity is generated from renewables. National Grid expects battery storage to make up the largest portion of storage power capacity in all scenarios by 2050.

10.15 Energy White Paper: Powering our Net Zero Future - A key objective of this paper is the necessity to move towards a smarter electricity system, where electricity markets are required to adapt to the deployment of renewable energy generation increases. The report states that electricity demand could double by 2050. Thus requiring an increased renewable energy output to accommodate for the shift in electric consumption.

10.16 Climate Change Act 2008 (2050 Target Amendment) Order 2019 - This act introduced the UK's statutory target to reduce its carbon dioxide emission to below 80% of the country's 1990 levels by 2050. The main energy generation production in the UK is dependent on Coal, Oil and Gas. The need to comply with the legal requirement to become carbon neutral by 2050 places a statutory requirement on the planning system to deliver a greater number of renewable energy generation sources and associated infrastructure required to support the grid.

10.17 National Policy Statement for Energy (EN-1 & EN-3) -EN1- The NPS states that substantial weight should be given to low carbon renewable energy projects when considering applications due to the urgent need for them and concludes that there

[1] Climate emergency

[2] Redditch Carbon Reduction Strategy Implementation Plan October 2022

is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet national security and net zero aims. EN3 - states that The Committee for Climate Change (CCC) has identified a need to deploy 54GW of solar by 2035 to keep on track to deliver net zero by 2050 which equates to roughly 40GW of solar by 2030.

10.18 British Energy Security Strategy (April 2022) – notes long-term solutions to address the UK's underlying vulnerability to international oil and gas prices by reducing our dependence on imported energy. It highlights the necessity for a secure, home-grown, reliable flow of affordable energy. There is a need for domestic supply of clean and affordable electricity will require accelerating the connecting network infrastructure to support it. Within this decade two key features will be prioritised: anticipating need because planning ahead minimises cost and public disruption; and hyper-flexibility in matching supply and demand so that minimal energy is wasted. A more efficient, locally responsive system could bring down costs by up to £10 billion a year by 2050.

10.19 Net Zero Strategy: Build Back Greener – outlines a strategy for reducing emissions from each sector of the economy and sets a delivery pathway showing the reduction of emissions across sectors to meet targets by the sixth carbon budget (2033- 2037) to reach net zero emissions by 2050.

10.20 Clean Power 2030 Action Plan – to tackle three major challenges: the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. It is estimated that electricity demand could rise by around 11% by 2030, and flexible capacity, including 23-27 GW of battery capacity and 4-6 GW of long-duration energy storage will be required by 2030. Currently, for energy storage, there is estimated to be around 5GW.

10.21 As noted, the Clean Power 2030 Action Plan is one of the key documents that is anticipated to be used by Developers, Businesses, Policy Makers, Councils etc to assist in the delivery of clean electricity power. The provision of clean electricity power is considered an urgent priority by the Government.

10.22 Whilst the proposal would not generate renewable energy, it would store power. The proposed BESS would allow intermittent renewable energy such as wind and solar power to be stored when supply is high and released to the electricity grid network during times of peak demand. This is significant as typically wind turbines and solar panels have variable generation and this supply needs to be managed. Demand too would vary according to season and time of day. Given these variables, battery storage is essential to help manage the use of renewables so that they can be relied upon which supports their continued development and a low carbon futures. Without the system services to support zero carbon

technologies, stabilising the National Grid will be challenging and will constrain the amount of renewable energy that can be utilised by the grid.

10.23 Whilst the proposal would manage all electricity use, including that generated by fossil fuel, it would still manage some renewables. The renewable and low carbon energy Planning Practice Guidance encompasses battery storage and acknowledges its de-carbonising role. The NPS goes further stating storage has a key role in achieving net zero. Similarly, the Glossary to the Framework defines low carbon technologies as those that can help reduce emissions. Consequently, these confirm that the proposal represents a low carbon. Moreover, the proposal is for a 40 year use and the vast majority of energy stored would be from renewable sources: the Overarching National Policy Statement for Energy (NPS) foresees that by 2035 all our electricity will need to come from low carbon sources, subject to security in supply.

10.24 It is evident from all the above documents/guidance that there is a need to deliver improvements to energy efficiency and energy management. Managing the National Grid is of upmost importance, requiring the necessary infrastructure—such as this development—to provide essential support to the electricity grid. Although most of these documents are not explicitly planning policies (aside from the National Policy Statement for Energy), they are high-level strategic Government documents/frameworks with a clear intent, making them a material consideration in the planning decision-making process.

11 Potential of Cumulative Impact

11.1 The proposed scheme represents one of two BESS planning applications in the surrounding area. Details of the other schemes are outlined in the Other Relevant Planning History section above.

11.2 The potential for all battery storage sites to be delivered within the locality is acknowledged, however it is not considered this factor represents a justifiable basis as a reason for refusal for this application. For that to have any merit it would be important to capture what the impact might be from installing and operating all sites together. Where it is possible to capture any in-combination effects such as the impact on the local road network or character and appearance of the area, this report assesses that impact in the relevant sections below. The cumulative effects of multiple energy schemes in this locality are a material consideration. However, each case must be determined on its individual merits and in accordance with planning policy. The same reasoning applies to any concerns regarding setting a precedent for such development.

11.3 As part of the consideration of this planning application, it is not considered appropriate to factor in the potential cumulative impacts of other BESS development (or any other development) that is not even subject of a planning

application and even if a planning application was received, not granted or being built out.

12 Green Belt and Grey Belt

12.1 The application site is within the Green Belt. The main issue in establishing the principle of the development is firstly, whether or not the proposal constitutes inappropriate development in the Green Belt for the purposes of Policy 8 Green Belt and the Framework. Secondly, if the development is inappropriate, whether the harm by reason of inappropriateness, and any other identified harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify the development.

12.2 Policy 8 Green Belt states that applications for development in the Green Belt will be "determined in line with national guidance on Green Belts and other relevant policies within the development plan". An assessment against National Policy is provided below.

12.3 Paragraph 153 of the Framework states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 154 outlines a list of exceptions where development may be acceptable in the Green Belt, it is noted that there are now further exemptions since the Framework was amended in December 2024 in paragraph 155.

12.4 There are further potential exceptions to development being treated as defined as inappropriate with in the amended Framework, namely whether the site amounts to 'Grey Belt' as defined in the Framework and if so whether certain criteria are met. If met this means development is not inappropriate and there is no need to demonstrate very special circumstances.

Grey Belt

12.5 Development in the Green Belt is inappropriate unless one of the exceptions listed in paragraph 154 of the Framework applies. However, paragraph 155 indicates that:

The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

a) the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan,
b) there is a demonstrable unmet need for the type of development proposed,
c) the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework, and

d) where applicable the development proposed meets the "Golden Rules" requirements set out in Framework paragraphs 156 and 157.

12.6 The Glossary to the Framework defines Grey Belt as,

"…Grey Belt is defined as land in the GB comprising previously developed land (PDL) and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in NPPF paragraph 143. Grey Belt excludes land where the application of the policies relating to the areas or assets in Footnote 7 (other than GB) would provide a strong reason for refusing or restricting development."

12.7 Footnote 7 refers to Framework policies, rather than those in development plans, relating to: habitats sites, and those sites listed in paragraph 194, and/or designated as Sites of Special Scientific Interest; land designated as GB, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets and other heritage assets of archaeological interest referred to in Footnote 75; and areas at risk of flooding or coastal change.

12.9 In this case, the site is not PDL, however, to determine whether the site falls to be considered as Grey Belt, the site has to pass the test of whether the land, does not strongly contribute to Purpose a - to check the unrestricted sprawl of large built-up areas, Purpose b - to prevent neighbouring towns merging into one another listed in Framework paragraph 143 and Purpose d - to preserve the setting and special character of historic towns.

Purpose a – Sprawl

12.10 The Framework does not contain a definition of what might constitute sprawl. Concluding on whether the development would conflict with Purpose a, depends on the relationship of the site with the large built-up area. PPG Paragraph 005 explains how to assess the contribution which land makes to the relevant Green Belt. With regard to Purpose (a) it explicitly states that "villages should not be considered large built up areas"

12.11 The site is located within the open countryside and is located 2km to the east of Feckenham and 1.5km to the southwest of Astwood Bank. Paragraph 1.23 (Local Portrait) of the Local Plan states "Redditch Borough consists of the main town of Redditch, the villages of Astwood Bank and Feckenham and several other hamlets." Accordingly, Feckenham and Astwood Bank are villages and thus are not "large built up areas" in line with PPG.

12.12 The development would be physically and visually discrete from the large built-up area of Redditch. In this context, the site does not strongly contribute to Purpose a.

Purpose b – Merging

12.13 The countryside and open land between towns (in this case Redditch and Alcester) is always under pressure from development and it is rarely the case that a single development, on its own, would cause neighbouring towns to merge. However, such areas could be lost incrementally and, over time, lead to the merging of neighbouring towns.

12.14 In this case, albeit temporarily, there would be a loss of Green Belt land between towns. This would result in a minor, temporary reduction, in the gap between these towns. Therefore, the proposal would not contribute to the possibility of these towns merging. The gap function of other parcels within the Green Belt will continue, regardless of the proposed development. The BESS would have no material impact on the perception of the gap. In this context and given the proposal would be temporary and would not lead directly to the merging of neighbouring towns, the site does not strongly contribute to Purpose b.

Purpose D - To preserve the setting and special character of historic towns

12.15 While Feckenham is designated as a Conservation Area and includes several listed buildings as well as a Scheduled Monument for the assessment of grey belt it is not a historic town. This application is accompanied by an archaeology desk-based assessment and heritage statement, which concludes that no built heritage assets or their settings will be affected by the proposal. It is therefore considered that the setting and special character of Feckenham will be preserved. Furthermore, the site does not form part of the setting of this historic village and does not have any visual, physical or experiential connection with it. As such, it is concluded that the site does not strongly contribute to purpose (d) of the Green Belt and is considered Grey Belt land.

Conclusion on Grey Belt Status

12.16 The proposal site does not strongly contribute to any of the three Green Belt purposes required to be considered in a Grey Belt assessment, this is clearly demonstrated above.

12.17 When considering the application of the policies in footnote 7 of the Framework (other than Green Belt) it is not considered that these provide a strong reason for refusing the development. There is an extensive discussion on heritage matters elsewhere in this report and it is concluded that whilst concerns have been raised by heritage advisors these do not provide a strong reason for refusing or restricting the development as set out in the application documentation.

12.18 On this basis, and in line with the definition of Grey Belt in the Framework (i.e. …..land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.) that the site is considered Grey Belt land.

Paragraph 155 Grey Belt Criterion A

12.19 This criterion requires that the development proposed would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (not just this application site). I take this to mean an assessment of the proposal against all 5 of the purposes of the Green Belt. Criteria a, b and d have already been assessed above however this leaves the other 2 criteria in paragraph 143 to be applied.

12.20 With regard to Green Belt purpose (c), namely, safeguarding from encroachment, it is accepted that the spatial occupation of the site would clearly encroach into the countryside. However, in relation to the wider parcel of Green Belt which forms the strategic function, within which the site lies, the comparatively small nature of the site itself is such that the harm resulting from encroachment would be negligible when tested against the contribution of the larger parcel to the Green Belt across the area of the Local Plan. Thus, the proposal would not undermine this purpose.

12.21 Furthermore the site is located within a landscape that is already characterised by energy infrastructure, in close proximity to a substantial substation and beneath overhead lines. It is also located to the west of Astwood Business Park. As such, it does not introduce development into unspoilt or uninterrupted countryside, nor does it degrade the rural character of the wider area.

12.22 Regarding Green Belt purpose (e), namely, assisting urban regeneration by encouraging recycling of derelict and other urban land, reference should be made to section 4.5 of the Planning Statement submitted in support of this application. In the absence of an alternative site, there would be no conflict with Purpose e to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

12.23 In these circumstances, the proposed development would not fundamentally undermine this purpose of Green Belt criterion (e) i.e. assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.

12.24 Drawing all the above matters together, it is concluded that the development would not fundamentally undermine, the purposes when taken together of the remaining GB in the plan area. Criterion A of paragraph 155 is met.

Paragraph 155 Grey Belt Criterion B

12.25 This criterion requires that there is a demonstrable unmet need for the type of development proposed. The consideration that a BESS project fulfils this requirement and has been substantiated through appeal case law.

12.26 A number of objection representations note that applications for BESS are being considered on an individual basis and that is there is no clear strategy of where these BESS facilities should be located and how many of these BESS facilities are needed, if they are needed at all.

12.27 The Framework at Paragraph 168(a) identifies that applicants should not be required to demonstrate the overall need for renewable or low carbon energy, and that local planning authorities should give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future. The Government's vision is to transition to a net zero economy and to ensure a secure, reliable and affordable energy supply, with a legally binding target to reduce the UK's greenhouse gas emissions by 100% by 2050, compared with 1990 levels. The Framework paragraph 161 specifically identifies that the planning system should support this transition to net zero by 2050.

12.28 There is a very clear steer from Government to promote renewable technology in order to meet net zero ambitions. A recent allowed appeal decision for a BESS Staffordshire Moorlands District Council (Appeal Ref: APP/B3438/W/24/3351328) sets out in paragraph 26 that *"The need to reduce carbon emissions from energy is of fundamental importance and well documented" and furthermore in paragraph 28 that "Storage is needed to reduce electricity system costs and increase reliability by storing surplus electricity in times of low demand to provide it when demand is higher".*

12.29 The question of need has also been explored in a January 2026 appeal decision for a solar farm in Buckinghamshire (APP/J0405/W/25/3372885), in which the Inspector concluded in paragraph 27 that "*While I note comments that there is already a sufficient pipeline of consented projects to meet net zero, even if this was the case, it does not act as a ceiling to permit further projects. The renewable energy credentials of the proposal is a matter which attracts significant weight in favour of the proposal"*.

12.30 Consequential to these and other well publicised national and local ambitions to achieve net zero, which includes supporting the essential national need for BESS facilities, Officers conclude that it is highly evident that there is a demonstrable unmet need for the proposal. The BESS proposal therefore complies with Paragraph 155(b). Also of note, is that there is no requirement either in the Framework or the development plan for a developer to undertake an alternative site assessment. The application has however been submitted with a Site Selection (Section 4 of the Planning Statement(which sets out an approach to identify suitable locations within 3km of the Feckenham national grid connection

point, concluding that this site is the most suitable in meeting various operational criteria (including proximity to the grid connection), whilst also meeting the minimum size and site conditions required.

Paragraph 155 Grey Belt Criterion C

12.31 With regards to Paragraph 155 c, which requires the development to be in a sustainable location, Paragraph 110 of the Framework indicates that significant development should be focussed on locations that are or can be made sustainable, through limiting the need to travel. This Paragraph goes on the say that opportunities to maximise transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making. This would appear to relate to development that would generate significant level of vehicle movements, particularly by car, which following commissioning would be at very low levels in this case (the application submission sets out a negligible level of weekly trips, restricted to routine maintenance only). This is reflected in the assessment by WCC Highways. The requirement of criterion (c) of Paragraph 155 of the Framework is therefore met.

Paragraph 155 Grey Belt Criteria D

12.32 Criterion D refers to major housing development and the 'Golden Rule' does not apply.

Conclusions on Grey Belt Exemption

12.33 The relevant criteria contained in Framework paragraph 155 are met and this development therefore does not fall to be considered as inappropriate development in the Green Belt. As the development is considered to be not inappropriate, it should not be regarded as harmful either to the openness of the Green Belt (or to the purposes of including land within it, as explained).

12.34 Having regard to all the above it is concluded that the application is considered to meet the exception in paragraph 155 of the Framework and is not considered to be inappropriate development in the Green Belt. Therefore, as a matter of principle, it does not conflict with Policy 8 or the Framework. As the development is not considered to be inappropriate there is no need to assess openness or to demonstrate very special circumstances to justify the proposal.

12.35 However, for robustness and completeness, should Members disagree with the above assessment and conclude that the development does not fall within the Grey Belt exception and the development must therefore be treated as inappropriate development in the Green Belt, then the following assessments on impact on openness as well as whether very special circumstances can be demonstrated have been undertaken.

Impact on Openness

12.36 Paragraph 142 of the Framework states that, 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

12.37 The proposed development would occupy an area of undeveloped land. While some land will be used for landscape and ecological enhancement, the development is highly functional and utilitarian. Most structures will be below 3m in height. Although the development is contained within existing and proposed planting, including reinforced landscaped boundaries, it would result in a loss of spatial openness due to its extent and spread.

12.38 In terms of the visual dimension of openness, existing mature planting, although helping to filter views into the site, does not presently effectively screen the site and the proposal would represent a contrast to the undeveloped agrarian landscape, including a views through trees on Astwood Lane and from public footpaths. The localised visual effect would increase during the winter months although the existing strong mature planting and its reinforcement and enhancement by new landscaping would mean that the development would be viewed through several layers of planting. Notwithstanding, from close distances, including along existing public footpaths, the visual effects would be considerable as it would still result in a change from an agricultural landscape to a more industrialised and utilitarian landscape. From further afield, the proposal would occupy a relatively small area of land in the overall landscape.

12.39 In this context, the development would remain visible from a number of viewpoints and although the mitigation would temper the effects, due to the scale of the proposed development and its intermittent visibility particularly at certain times of the year, there would be a considerable loss of openness in terms of the visual and spatial dimensions of the Green Belt. Nevertheless, the impact on the Green Belt would not be permanent. However, if the site was no longer needed during the 40 years or at the end, it would be relatively straightforward to remediate the land to its existing state. This would be included as a condition to ensure the development would not become a permanent feature in the landscape if it no longer in use during the 40 years or at the end of the 40 years.

12.40 Overall, the proposal's effect on the openness of the Green Belt expressed in terms of its spatial and visual dimensions, despite the time limit of 40 years which in any event, would constitute a generational negative change, would amount to a considerable harm to loss of openness on a temporary but long-term basis. This would conflict with the Green Belt's purpose to safeguard the countryside from encroachment and conflict with Policy 8.

12.41 As stated in paragraph 160 of the Framework, 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.

Very Special Circumstances

12.42 It should be noted that the Framework at paragraph 160 notes that 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.

12.43 Consideration has been given earlier in respect of whether there is a demonstrable unmet need for the type of development proposed in the context of meeting Grey Belt criterion B.

12.44 Environmentally, the scheme helps address a key challenge of renewable energy: intermittency. By storing excess energy generated during peak production and releasing it when demand is higher, the BESS reduces the need to curtail renewable generation and limits reliance on fossil-fuel “peaker plants.” This improves overall grid efficiency, reduces carbon emissions, and supports progress toward net zero. In addition, the scheme delivers measurable biodiversity net gains through habitat creation, hedgerow planting and ecological enhancements, increasing the ecological value of the site while also helping screen the development.

12.45 Economically, the development offers significant benefits by capturing energy that would otherwise be wasted due to grid constraints, avoiding substantial curtailment costs and improving efficiency across the energy system. It also contributes to stabilising electricity prices by balancing supply and demand, reducing the need for expensive imported fossil fuels and helping to address fuel poverty. The project supports local and wider economic activity through job creation during construction and operation, use of local contractors and services, and long-term maintenance contracts. Over its lifetime, the scheme is expected to generate substantial economic value, while being delivered without public subsidy and making efficient use of existing grid infrastructure.

12.46 Socially, the development enhances national and local energy security by reducing dependence on imported fuels and increasing the resilience of the electricity network. By supporting a more stable and reliable energy supply, it helps protect households and businesses from price volatility and potential power shortages. Improved grid resilience also reduces the risk and impact of outages, supporting

continuity of services and economic activity. Overall, the combination of environmental, economic and social benefits is presented as substantial and collectively form the very special circumstances case outlined by the applicant.

12.47 This element is further assessed in Section 23.

13 Loss of Agricultural Land

13.1 Paragraph 187b of the Framework states that decisions should "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland".

13.2 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. Whilst this paragraph relates specifically to allocating land for uses such as housing or employment as part of plan making, it is considered that it can equally apply to decision making, particularly for large developments. It is worthy of note that the latest version of the Framework against which decisions are to be made has removed the availability of agricultural land use for food production to be considered against other relevant policies both nationally and locally.

13.3 There is no definition of 'significant development of agricultural land' in planning guidance or legislation although it is noted that Natural England are only consulted where there would be a loss of more than 20ha of BMV land (DMPO 2015). Applying the Agricultural Land Classification (ALC) (England) data, the site is Grade 3b Moderate Quality Agricultural Land. It is therefore not considered to be significant development in that regard.

13.4 It is considered that the proposed development, given that it is time limited and could be reversed in future, is unlikely to lead to significant permanent loss of BMV agricultural land as a resource for future generations. Although it is accepted that the development would prevent any food production taking place on this particular site for the lifetime of the development, it is not anticipated that the temporary loss of this land would compromise the Borough's overall farming ability.

13.5 The proposed development complies with the Framework regarding preserving best and most versatile agricultural land and Local Plan Policy 5 in terms of making efficient use of land.

14 Character and Appearance including landscape

14.1 Paragraph 8 of the Framework sets out the three overarching objectives of the planning system, of which includes an environmental objective to "to protect and enhance our natural, built and historic environment…". Paragraph 9 also sets out that: "…decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area".

14.2 The Framework includes for the conservation and enhancement of the natural environment by protecting and enhancing "valued landscapes" and sites of biodiversity or geological value / soils. It also recognises the intrinsic character and beauty of the countryside, and the wider benefits of natural capital and other ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. The overarching objective to protect and enhance our natural, built, and historic environment is reflected in specific policies about: achieving well-designed places (Section 12); conserving and enhancing the natural environment (Section 15); and conserving and enhancing the historic environment (Section 16).

14.3 As outlined above, the UK Government's position on power is set out in the National Policy Statement for Energy (EN-1), which recognises the importance of understanding and addressing landscape and visual impacts. Paragraph 4.7.2 states that: *"Applying 'good design' to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area".* Furthermore, Para 2.5.2 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) also states *"Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity…and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage".*

14.4 At the local level, Policy 16 Natural Environment outlines that through new development proposals, the Borough Council will seek to promote the protection and enhancement of the natural environment and landscape.

"A high quality natural environment and landscape is integral to delivering the vision of BORLP4. In order to achieve this all relevant proposals will be expected to:

iii. Demonstrate that the Borough's distinctive landscape is protected, enhanced and restored, as appropriate and proposals are informed by, and sympathetic to, the surrounding landscape character

iv. Avoid any significant adverse impacts on skylines and hill features, including established views of these features."

14.5 Policy 11 Green Infrastructure seeks to safeguard the Green Infrastructure (GI) Network and new development will be required to contribute positively to the GI. The GI Network is a multifunctional resource that includes, but is not limited to, green spaces and corridors, waterways, natural heritage and wildlife habitats.

14.6 A Landscape and Visual Appraisal (LVApp) has been submitted by Tir Collective to assess the effects of the proposed Battery Energy Storage System development at Wheaten Hill. The site lies within the West Midlands Green Belt but outside any nationally or locally designated landscapes and the LVApp does not address Green Belt policy matters. The assessment considers effects on landscape character and visual amenity within a 2 km study area, with cumulative effects assessed up to 3 km.

14.7 The methodology distinguishes between:

- Landscape effects: impacts on character, fabric and qualities of the landscape; and
- Visual effects: impacts on views experienced by receptors including residents, users of public rights of way, and road users

Landscape Context

14.8 The site lies within National Character Area 97: Arden, characterised by a well-wooded farmland landscape, rolling topography, mature hedgerows, scattered woodland, and a mixed agricultural pattern.

14.9 At the local level, the site falls within Worcester Landscape Character Types:

- Principal Timbered Farmlands, and
- Wet Pasture Meadows,

14.10 These landscape character types are typified by hedgerow field patterns, mature oak trees, pastureland, and a dispersed settlement pattern.

14.11 The application site itself comprises, predominantly arable farmland in the eastern section and existing infrastructure including Feckenham substation, pylons and overhead cables in the western section. The sites field boundaries defined by hedgerows and trees.

14.12 The wider landscape exhibits rural characteristics but is influenced by detractors including overhead pylons, traffic on nearby roads, and adjacent infrastructure.

14.13 The LVApp identifies key characteristics of the site as:

- Gently undulating arable land
- Field patterns defined by hedgerows and tree lines
- Rural openness and short to mid-distance views
- Presence of public rights of way across the site

14.14 Overall, the landscape is assessed as being of local (medium) value, reflecting its typical rural character but absence of national or statutory designation.

Mitigation

14.15 A range of mitigation measures are incorporated into the designed to avoid or reduce adverse effects, which include:

- Retention and reinforcement of existing hedgerows
- Native hedgerow and tree planting
- Buffer zones to protect existing vegetation
- Recessive colouring of infrastructure
- Underground cable routing to minimise surface disturbance

14.16 Overall, these measures aim to integrate the development into the landscape and reduce visual prominence over time.

Effects on Landscape Character

14.17 The LVApp assesses effects at three stages:

- Construction
- Operation at Year 1
- Operation at Year 10

14.18 The degree of the likely landscape effects of the proposed development is determined by relating the sensitivity of the receptors to the changes arising from the proposals, and the degree and nature of the changes in the landscape arising from the proposed development. The principal landscape effects identified are:

Receptor	**Construction**	**Year 1**	**Year 10**
Low-lying arable	Moderate adverse	Minor adverse	Minor adverse

landscape			
Field pattern	Minor adverse	Minor adverse	Negligible
Rural openness	Moderate adverse	Minor–moderate adverse	Minor adverse
PRoW landscape experience	Moderate adverse	Minor adverse	Negligible

14.19 During construction period, impacts will arise from the removal of agricultural land and introduction of infrastructure, resulting in short-term disturbance.

14.20 During operation, impacts reduce as mitigation planting establishes. By Year 10, effects are generally minor adverse or negligible, with landscape integration achieved through planting.

14.21 The development would introduce engineered structures into a rural landscape, resulting in some erosion of rural character; however, the presence of existing pylons and substation infrastructure means the site is not wholly undeveloped.

Visual Effects

14.22 The degree of the likely visual effects of the proposed development is determined by relating the sensitivity of the receptors to the changes arising from the proposed development, and the degree and nature of the changes in the views available to people and in their visual amenity arising from the development. Visual effects are assessed based on six representative viewpoints and receptor groups, including:

- Residents
- Public rights of way users
- Road users

14.23 The Zone of Theoretical Visibility (ZTV) analysis demonstrates that visibility is largely contained within the immediate vicinity due to rolling topography, existing woodland and hedgerow screening as well as other existing development features. A Zone of Theoretical Visibility (ZTV) is a computer-generated plan identifying the areas from which a development may theoretically be visible, based on landform and modelled data.

Viewpoint	**Location / Receptor**	**Distance / Direction**	**Sensitivity**	**Construction**	**Year 1 Operation**	**Year 10 Operation**

VP01	Public right of way within the site	Within the site	Moderate	Major adverse	Moderate–major adverse	Moderate adverse
VP02	Bridleway at Wheaten Hill (west of site)	~22m west	Moderate	Major adverse	Moderate–major adverse	Moderate adverse
VP03	PRoW node east of Feckenham	~36m west	Lesser	Minor adverse	Minor adverse	Minor adverse
VP04	B4090 Salt Way (road users)	~52m south	Lesser	Minor–moderate adverse	Minor–moderate adverse	Minor adverse
VP05	PRoW east of site	~50m east	Lesser	Minor–moderate adverse	Minor adverse	Minor adverse
VP06	PRoW near Berrowhill Farmhouse	~1.5km northwest	Moderate	Minor–moderate adverse	Minor–moderate adverse	Negligible

14.23 The above table summarises the visual effects experienced at each representative viewpoint. The findings demonstrate that the most significant effects are experienced at viewpoints within or immediately adjacent to the site, particularly along public rights of way and elevated routes such as Wheaten Hill.

14.24 At these locations, close proximity and open views result in major adverse effects during construction, reducing to moderate adverse effects over time as mitigation planting establishes. At greater distances, or where views are filtered by vegetation and landform, effects are reduced to minor or negligible, particularly by Year 10.

14.25 These findings confirm that visual effects are localised and diminish rapidly with distance, consistent with the ZTV analysis and the relatively contained nature of the development. The highest visual effects arise for receptors in close proximity with open views. Effects reduce rapidly with distance and screening.

14.26 By Year 10, mitigation planting results in the increased filtering of views, reduced visual contrast and a greater assimilation into the landscape.

Cumulative Effects

14.28 The LVApp identifies cumulative development including nearby BESS and solar schemes within a 3km radius. The following schemes have been identified as having potential to contribute to cumulative landscape and visual effects:

- Feckenham Greener Grid Park (BESS) – approved scheme located approximately 700m to the west of the site.
- Land at Astwood Lane, Feckenham (BESS) – development submitted for planning, located approximately 600m to the northwest of the site.
- Land at Saltway Farm, Feckenham (BESS) – for the purposes of the LVAPP the scheme was scoping stage, located approximately 400m to the west of the site. As outlined in section 5.5 above the Council are not currently considering a planning application on this site.
- Land at Earls Common Road, Stock Green (Solar Farm) – cross boundary application between Wychavon DC W/23/00270/FUL and Redditch BC 23/00192/FUL submitted for a solar farm development located approximately 3km to the southwest of the site. This application has subsequently been withdrawn in February 2026.

14.29 These schemes have been considered collectively alongside the proposed development to assess potential additive, sequential and cumulative visibility effects. Other developments at earlier stages or beyond the defined study area have not been included, due to uncertainty or lack of potential for meaningful cumulative interaction.

14.30 Cumulative effects are assessed as:

- Minor adverse at a local level for both landscape and visual receptors
- Limited spatial extent, largely concentrated around the substation and immediate surroundings

14.31 While multiple schemes may collectively increase the presence of energy infrastructure, they would generally be perceived as discrete developments due to topography and vegetation.

14.32 The LVApp has been reviewed by Places Services the Redditch BC appointed landscape consultant. Place Services raise concerns regarding the scale and industrial character of the proposed BESS development within an open rural landscape. They consider that the Landscape and Visual Appraisal underestimates effects on landscape character and visual amenity, particularly for users of nearby public rights of way and local residents. Concern is expressed that the development would appear prominent and visually intrusive in close-range

views and that the cumulative presence of energy infrastructure in the area risks incremental landscape harm.

14.33 Place Services advise that insufficient viewpoints have been assessed, especially from sensitive receptors such as public footpaths crossing or adjacent to the site, and request additional representative viewpoints to better demonstrate visual effects. They further consider that the proposed landscape mitigation lacks sufficient structure and certainty, with reliance on hedgerow planting that would take a long period to mature and may not adequately soften the development in the interim. Overall, Place Services object to the proposal on landscape and visual grounds and recommend further assessment and strengthening of the landscape strategy to reduce impacts.

14.34 In their email response, Tir Collective (the applicants consultant) address the concerns raised by Place Services regarding landscape and visual effects. They disagree with the conclusion that the Landscape and Visual Appraisal (LVApp) underestimates impacts, stating that the assessment follows accepted methodology and that the viewpoints selected are representative of the most sensitive receptors. The applicant considers that additional viewpoints would not materially alter the conclusions reached, particularly for users of public rights of way.

14.35 Tir Collective state that the site context is already influenced by existing infrastructure, including the nearby substation and overhead power lines, and that the proposal would not introduce an uncharacteristic form of development within this immediate setting. They consider that the predicted effects on landscape character and visual amenity have been appropriately assessed as localised and time-limited.

14.36 In response to comments on mitigation, the applicant maintains that the proposed landscape strategy is proportionate and capable of effectively integrating the development as planting establishes. While not identifying a requirement for substantive changes, the email acknowledges that limited additional planting, particularly around the substation, could be accommodated at the detailed design stage. Overall, the applicant concludes that Place Services' comments do not warrant further assessment work or changes to the scheme, and that landscape and visual effects would reduce to acceptable levels over time.

14.37 Officers note that the applicant's email provides clarification of their assessment approach and justification for the conclusions reached within the submitted Landscape and Visual Appraisal. While no additional visual material or revisions to the mitigation strategy have been provided, the response is afforded moderate weight in explaining the applicant's position, with any remaining landscape and

visual concerns considered capable of being addressed through conditions and secured mitigation.

Conclusions

14.38 The proposed development would give rise to adverse landscape and visual effects, particularly during the construction phase and early years of operation, arising from the introduction of engineered infrastructure into a predominantly rural setting. The magnitude of effects would reduce over time as mitigation planting establishes, with landscape effects generally diminishing to minor adverse or negligible by Year 10, and visual effects becoming more filtered and localised. The development would therefore give rise to some conflict with Policies 11 and 16 of the Redditch Local Plan, insofar as it would not fully conserve or enhance landscape character.

15 Highways, Access and Parking

15.1 Policy 19 Sustainable Travel and Accessibility requires that 'Development should comply with the Worcestershire County Council's Transport policies, design guide and car parking standards, incorporate safe and convenient access and be well related to the wider transport network'.

15.2 In line with paragraphs 111 and 112 of the Framework, the impact of development proposals on the highway network should be considered. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

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

15.4 The TS confirms the main construction and operation access will be provided from Salt Way to the south of the site, making use of an existing, well-established private access track. This access will be designed in accordance with local design standards and provide sufficient corner radii to allow vehicles to enter the site in a safe manner. The TS also confirms a separate emergency access will also be provided from Astwood Lane to the north of the site, which leads to an existing farm track to the north of the site.

15.5 The Highway Authority does not objection to the principle of the proposed access arrangements, given they are both well established and used by agricultural vehicles. The design of the construction and operational access shall be agreed with the Highway Authority, but this can be covered by a suitable condition.

15.6 The delivery and construction/installation period of the proposed BESS is expected to take place over an 18-month period. During peak periods of the construction phase (approximately three months), up to 100 construction workers are expected on-site for electrical works, including the installation of inverters, transformers, and cabling. The origin of the workforce's travel will depend on the appointed Principal Contractor and is unknown at this stage. However, it is anticipated that some non-local workers will stay in local accommodation and be driven to the site via minibuses, minimising the impact on the local highway network.

15.7 The TS advises the most intense month periods would be 10, 11 and 12, with up to 155 HGVs coming to the site each month. The most intense 6-week period of construction is estimated to see 234 HGVs coming to the site (468 two-way movements). However, this equates to just 7 daily arrival trips, on average, being 14 two-way HGV trips. The majority of these vehicles would be articulated HGVs.

15.8 The Highway Authority is of the opinion an average of 14 daily two-way HGV movements, during the busiest period, is not significant, especially if spread throughout the day. The Construction Transport Management Plan (CTMP) also mentions there will be other construction-related traffic movements associated with smaller vehicles, such as the collection of skips for waste management, the transport of construction workers and sub-contractors. Again, the Highway Authority is of the opinion such flows will be minimal, in terms of existing baseline traffic flows, and can be accommodated on the local highway network without creating any significant detrimental impact.

15.9 As noted, during peak construction periods (approximately three months), the site is expected to accommodate a maximum of approximately 100 workers. For other construction months, fewer workers would be on site, reducing the associated two-way vehicle trips. Construction activities are expected to operate on a two-shift pattern during weekdays, with workers distributed evenly between morning and afternoon shifts. On Saturdays, due to reduced working hours, a single shift will operate, with all staff following the same schedule.

15.10 Given the short-term nature of the development, in terms of construction traffic, it would be difficult to seek to justify a recommendation of refusal, in relation to the volumes of construction traffic.

15.11 The CTMP discusses potential construction traffic routing. It assumes the majority of HGV traffic will use the M5 to access the wider area, routing to the site via:-

- Vehicles will travel either southbound or northbound on the M5 and use the slip roads to join A38;
- Vehicles will travel southbound on the A38 for approximately 2km the junction for B4065 Bromsgrove Road;
- Vehicles will continue on B4065 southbound until the junction for B4090 Hanbury Road, which later becomes B4090 Salt Way;

- Vehicles will continue traveling eastbound on Salt Way until the site access; and
- Vehicles departing the site would use the reverse route of the above.

15.12 The Highway Authority notes the proposed construction traffic routing proposals. From the M5, the suggested routing option is the most appropriate for HGV traffic and the Highway Authority supports it.

15.13 Neither the TS nor the CTMP discuss the proposed cabling laying in any detail. Some of the proposed cabling route runs through fields but there is a section of the cable that is proposed to be laid within the public highway of Astwood Lane but there are no details if this means the verge or the carriageway. From the proposed emergency access junction with Astwood lane, the cable would run westwards for approximately 800m to then connect with the existing Feckenham substation. The Highway Authority also needs to understand what impact the cable laying might have on any PRoW, in relation to a possible temporary closure or diversion.

15.14 Whilst any works within the public highways, for laying a cable, would be treated like a utility service, with the Contractor applying for an appropriate streetworks licence, details about temporary traffic management and duration are required.

15.15 After construction of the BESS facility is complete, the CTMP states operation and maintenance will result in approximately two visits per month. This will have no significant impact on the local highway network or access lanes. The Highway Authority has no objection to this subsequent trip generation. Associated vehicle trips are likely to be low and can be accommodated on the local highway network.

15.16 The Highway Authority does not object to the proposals subject to conditions that: the site access arrangement be provided in accordance with full construction details to be submitted to and approved, a highway dilapidation survey, and adherence to a new CTMP. It is considered reasonable and necessary that these conditions should be attached to any permission.

15.17 On the basis, it is considered that there would be an acceptable impact on highway safety subject to conditions, it is considered that there would not be an unacceptable impact on highway safety, or severe residual cumulative impacts on the road network and highways concerns is not considered to be a valid reason for refusal in this instance.

16 Flood Risk and Drainage

16.1 Policy 17 Flood Risk Management addresses matters relating with flood risk. It states, amongst other things, that all developments should fall within Flood Zone 1 and where a site falls outside this categorisation a comprehensive flood risk assessment will be required. This is supported by Policy 18 Sustainable Water

Management, which outlines that development should incorporate water efficiency measures and appropriate sustainable drainage techniques.

16.2 Section 14 of the Framework is concerned with how the Government expects the planning system to consider climate change, flooding and coastal change, and resilience to the impacts of climate change.

16.3 The application site is located within Flood Zone 1 and is therefore at low risk of fluvial and tidal flooding. Detailed assessment confirms that the site is not susceptible to flooding from rivers, groundwater, sewers or artificial sources, with the only identified constraint relating to localised surface water flow paths associated with existing topography and a boundary ditch. These areas of surface water risk have been taken into account in the site layout, with the battery storage infrastructure positioned outside the main flow routes. As a result, surface water flooding is not considered to pose a significant constraint to the development.

16.4 Notwithstanding the above, some localised surface water flooding is acknowledged, particularly affecting parts of the southern access track. This is an operational rather than land use constraint, and it is proposed that access will be managed appropriately during extreme rainfall events, supported by a Flood Warning and Evacuation Plan secured through condition. Subject to this, the development is considered to be safe for its lifetime without increasing flood risk to third parties.

16.5 A comprehensive surface water drainage strategy has been developed in accordance with national policy and best practice, incorporating Sustainable Drainage Systems (SuDS). The scheme will utilise a combination of permeable surfacing, filter drains and a detention basin to manage runoff across the site. Surface water will be discharged at greenfield runoff rates (QBAR) to an on-site ditch, ensuring that post-development runoff does not exceed existing baseline conditions. The drainage system has been designed to accommodate events up to and including the 1 in 100-year storm with an allowance for climate change, thereby ensuring the site remains resilient over its operational lifetime.

16.6 Infiltration drainage has been discounted due to site conditions, including low permeability geology and the need to manage potential contamination risks. Instead, an attenuation-led approach has been adopted, which is considered appropriate and policy compliant. Overall, the drainage strategy demonstrates that the development will not increase flood risk on-site or elsewhere and is acceptable in principle.

16.7 Given the nature of the proposed battery energy storage system, the drainage design incorporates specific measures to manage firewater runoff in the unlikely event of a fire. The site will operate a ‘tanked’ drainage system within the BESS compound areas through the use of impermeable surfacing, ensuring that potentially contaminated runoff is contained on site. Surface water, including any

firewater used during emergency response, will be intercepted via filter drains and directed to the detention basin.

16.8 A control mechanism, such as a penstock valve at the basin outfall, will enable the temporary containment of runoff, allowing for testing and, where necessary, removal and treatment off-site prior to discharge. This approach ensures that there is no uncontrolled release of potentially contaminated water to the wider environment and provides an appropriate level of environmental protection.

16.9 Evidence presented within the supporting technical documentation indicates that contamination risks associated with BESS firefighting runoff are generally low and can be effectively managed through standard drainage and containment measures. Accordingly, subject to the implementation of the proposed drainage infrastructure and operational controls, the development would not give rise to significant risks to water quality.

16.10 Taking all matters into account, the site is sequentially appropriate for the proposed development and can be safely developed without increasing flood risk elsewhere. Identified surface water issues are localised and can be appropriately mitigated through layout design and drainage measures. The proposed SuDS strategy, together with robust firewater containment arrangements, ensures that both flood risk and potential pollution pathways are effectively controlled. The development is therefore considered acceptable in flood risk and drainage terms, subject to appropriate planning conditions securing detailed design, management and maintenance. The proposed development is in line with the principles of the Framework, PPG, and local policy, and is therefore appropriate in terms of flood risk and drainage. The Environment Agency and the North Worcestershire Water Management (the Lead Local Flood Authority) have reviewed the information and raise no objections subject to conditions.

17 Neighbouring Amenity

17.1 Paragraph 180 of the Framework states that planning decisions should contribute to and enhance the natural and local environment by (amongst others) preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution.

17.2 Framework Paragraph 198 states that, ‘Planning policies and decisions should… a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life’ and ‘b), identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason…’.

17.3 Given the location of the development and relationship with neighbours, Officers are content that there would be no harmful impacts to neighbouring amenity in

terms of outlook, privacy or similar to a level sufficient to warrant refusal of planning permission. The main consideration is in relation to noise. Indeed, the application has received a number of objections from local residents who have raised concerns in respect of noise disturbance (including noise impacts to nearby schools). Other concerns noted include potential air quality impacts from any future fires at the site.

17.4 The application is supported by a noise assessment by SLR. This has been reviewed by WRS Noise.

17.5 The output from the modelling indicates that daytime rated levels should not significantly impact on (Noise Sensitive Receptors) surrounding the development (the closest residential property is located approximately 360m north east of the development) and that nighttime similarly should not be significant. As the predictions are based on assumed input levels, it is necessary to ensure that when constructed, that the actual noise levels are not higher than this. It is therefore suggested by WRS Noise that this be controlled by condition including the post installation verification of noise levels. As such, the distance of the nearby properties is considered sufficient to avoid any detrimental noise impacts arising from the proposal.

17.6 In terms of air quality, given the nature of the development there should be no resulting impacts. The Councils Environmental Health Officer has made an assessment of the application and has raised no objection on the grounds of air quality. A number of the objectors concerns relate to fire safety, including any impacts on air quality should such an event occur. Further discussion of fire safety is set out at Section 21 of this Report wherein it is outlined that the submitted Outline Battery Safety Management Plan (OBSMP) sets out the initial embedded design principles and describes the safety systems proposed at this preliminary design stage, and that an Emergency Response Plan is to be provided which would be actioned if such an event was to occur.

17.7 The application includes a Contaminated Land Report to provide advice regarding the nature and potential significance of contaminated land hazards which may be present at the study site. WRS Contamination have reviewed this and have no adverse comments to make.

17.8 In relation to battery waste, the disposal of battery units is governed by the 'Waste Batteries and Accumulators Regulation 2009 (amended)'. This establishes a framework for the separate collection, treatment and recycling of waste industrial, automative and portable batteries. As part of this, it is:

• Compulsory to collect/take back and recycle batteries and accumulators.
• A requirement to prevent batteries and accumulators from being incinerated or dumped in landfill.

17.9 In summary, any batteries which reach their end of life will be sent to regulated waste recycling facilities which hold environmental permits with the Environment Agency. At these facilities, they will be recycled in accordance with the above Regulations. In this respect, there is not a scenario in which old batteries would be stored inappropriately or put the local environment at risk.

17.10 A dedicated condition has been included as condition 5, this is proposed to ensure that decommissioning issues are considered early into the 40 year operation of the site.

18 Ecology and Biodiversity

18.1 Biodiversity Net Gain (BNG) is legislation that was put forward by Government. BNG is an approach to development. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. This should ideally be provided onsite however a developer is able to purchase offsite credits for BNG elsewhere should it not be possible to provide onsite.

18.2 Habitats are assigned a value based on their intrinsic biodiversity value or 'distinctiveness', which is predefined for each habitat within the metric. This value is then multiplied based on the size, condition and geographical location of the habitat in order to ascertain its absolute value in 'biodiversity units'. Separate calculations are used within the metric for area, based habitats, linear habitats (such as hedgerows) and watercourses (including ditches and streams). These units are non-transferable and must therefore be considered individually for each project or development. Collectively, they are referred to as 'biodiversity units'.

18.3 The Biodiversity Metric Report (by Bengrove Ltd) has been updated to reflect comments. This indicates that BNG will be delivered wholly on site for this application, and the resultant expected gains that the proposed development a total gain of 10.60 habitat units (16.88%), 3.26 hedgerow units (12.94%) and 1.17 watercourse units (19.94%)

18.4 The developer must maintain significant on-site habitats that they create or enhance for a minimum of 30 years. These habitats will be subject to a monitoring schedule that ensures they achieve the target condition and distinctiveness that was stated in the Biodiversity Metric.

18.5 The Ecological Impact Assessment (EcIA) concludes that the application site is of generally low ecological value, being dominated by intensively managed arable farmland with limited habitat diversity. Hedgerows, trees and water features provide some ecological interest at a local level, but designated sites are located

at distances sufficient to avoid direct effects, and no significant protected species constraints have been identified on site.

18.6 The proposed development would result in limited and largely temporary ecological impacts, primarily associated with construction activities such as vegetation clearance, potential disturbance to nesting birds, and minor pollution risks. These impacts are considered low in magnitude and confined to the site, with no significant residual effects anticipated subject to standard mitigation measures.

18.7 Following initial comments from the Councils ecologist (Thomson Environmental Consultants), particularly in relation to Great Crested Newts, hedgerows and Biodiversity Net Gain (BNG). Further information has been submitted all ponds within 500 m of the site have been reassessed, survey limitations explained, and a precautionary mitigation approach proposed to be secured through a Construction Environmental Management Plan. Hedgerow mapping and habitat references have been corrected and aligned across documents, and a revised BNG metric has been submitted demonstrating delivery of policy-compliant net gains across habitats, hedgerows and watercourses. While a fully updated Habitat Management and Monitoring Plan is not provided at this stage, the applicant proposes this be secured by condition.

18.8 The Council's Ecologist is satisfied with the assessment of impacts relating to protected species and designated wildlife sites. It is also considered that the biodiversity net gain can achieved on site and constitutes a significant gain in relation to the baseline habitats. The Ecologist has also outlined relevant conditions relating to a species enhancement plan, the biodiversity net gain habitat management and monitoring plan, compliance with the CEMP and ensuring no lighting is erected without permission. Subject to the inclusion of these conditions, appropriate material planning weight must be given to this uplift in biodiversity within the planning balance.

18.9 Mitigation measures, to be secured through a Construction Ecological Management Plan (CEMP) and ecological supervision, include timing restrictions on vegetation clearance, pre-commencement checks for protected species, pollution prevention controls, and precautionary working methods. These measures are considered sufficient to ensure compliance with relevant wildlife legislation and to avoid harm to protected species.

18.10 Subject to implementation of appropriate mitigation measures, the proposed development would comply with policy. This application is considered in accordance with Policy 46 and Section 15 of the Framework.

19 Trees

19.1 On the basis of the submitted arboricultural information, the site contains a mix of moderate and low-quality trees, with a number of higher-value boundary groups that contribute positively to landscape character. While some individual trees are in decline (notably ash affected by dieback), the majority are suitable for retention subject to appropriate design and protection measures. The survey identifies no in-principle arboricultural constraint to development, provided that Root Protection Areas are respected and tree loss is appropriately justified. It is therefore recommended that planning permission be granted subject to conditions requiring the submission and approval of an Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan, to ensure the satisfactory retention and protection of trees during construction in accordance with BS5837:2012. The Council's arboricultural officer has commented on the application and has no objection.

19.2 It is considered that the necessary protection methods, mitigation, and enhancement can be secured via conditions to ensure that the proposals are acceptable in relation to trees.

20 Heritage and Archaeology

20.1 The application site does not contain any heritage assets. However the entranceway to the site is located immediately to the east of Mutton Hall Farm (Grade II Listed) with the BESS units located in fields to the southeast just east of the ridge which runs from Astwood lane to Wheaten Hill. At present the entrance way to the site is a bridleway and footpath, the bridleway appears to lead to Wheaten Hill and the footpath appears to skirt the western boundary of the fields where the BESS units will be located.

20.2 Mutton Hall Farm comprises a 17th century timber framed, with rendered infill panels, property with 19th century alterations. It is single storey with attics, with dormer windows , beneath a pitched tiled roof. To the west is a modern weatherboarded extension. To the front are gardens and a gravelled driveway, also to the front are the separately listed water pumps. To the east are the original 19th century brick barns which have now been converted to residential use. The farmstead is surrounded by agricultural land. The significance of the farmhouse and the associated water pumps is indicated by their Grade II listing. It comprises a well preserved example of a vernacular 17th century timber framed farmhouse, with a number of features of architectural interest. It's significance is enhanced by its setting, the existence of the original farmstead arrangement is still legible, and the surrounding agricultural land all contribute to its interest.

20.3 In accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA), special regard has been paid to the desirability of

preserving listed structures or their settings or any features of special architectural or historic interest which they may possess. Paragraph 210 states that local authorities should take account of *'the desirability of new development making a positive contribution to local character and distinctiveness'*. Paragraph 212 states 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance', while Paragraph 213 requires that *'Any harm to or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification'*. Finally paragraph 215 in respect of designated heritage assets, requires that where development leads to less than substantial harm, this harm needs to be weighed against the public benefits of the scheme.

20.4 Policy 36 Historic Environment is relevant in that it sets out that designated heritage assets will be given the highest level of protection and should be conserved and enhanced. Applications for development affecting any heritage assets or its setting must be accompanied by a heritage statement. Policy 37 Historic Buildings and Structures outlines that the Borough Council will conserve and enhance its historic buildings and structures by supporting applications for development that conserve and enhance a building/structure, its setting and any features of special architectural or historic interest.

20.5 The conservation officer disagrees with the conclusions of the heritage statement that outlines that the proposal is assessed as resulting in no harm to the significance of designated heritage asset. The close proximity of the entrance way to the site to the Mutton Hall Farm and potentially some partial distant views of the tops of the BESS units would detract from the setting of the listed building and in turn cause some harm to its significance. This harm would be at the lower end of less than substantial harm. Reinforcing the boundaries as suggested with additional trees, although these will take some years to grow to a height sufficient to obscure the units, and the infilling of gaps in the hedgerow will mitigate some of this harm. Although the small amount of harm due to the construction of the access road would still exist. As the harm is less than substantial, it will, as required by paragraph 215 of the Framework, need to be weighed against the benefits of the scheme, as part of the wider planning balance.

20.6 An Archaeological Desk-Based Assessment (DBA) and Heritage Statement have been submitted, both of which conclude that the archaeological potential of the site is currently unknown. As a result, the significance of any potential archaeological remains and the likely impact of the proposed development cannot be fully assessed at this stage.

20.7 The geophysical survey undertaken in October 2024 identified no clear evidence of archaeological features; however, confidence in the results is reduced due to

interference from overhead electricity infrastructure, strong responses around field margins, and the site's underlying Mercia Mudstone geology, which is known to limit geophysical effectiveness. There has been little previous intrusive archaeological investigation within the site or its immediate surroundings.

20.8 While there are no known archaeological remains within the proposed development area, the wider landscape has archaeological interest, including prehistoric potential, a Roman road to the south, a speculative Roman fort approximately 350 m to the west, and extensive evidence of medieval and post-medieval settlement and agricultural activity.

20.9 Given the acknowledged uncertainty, the archaeological advisor recommends a programme of sample trial trenching prior to determination. This would clarify the presence, nature and significance of any archaeological remains, reduce risk to the developer, and allow mitigation or design amendments should remains of high significance be identified.

20.10 A proportionate and informed understanding of the nature of the proposed development and any likely archaeological impact has taken place. The Framework iterates that when determining planning applications for renewable and low-carbon development, local planning authorities should approve the application if its impacts are (or can be made) acceptable (Paragraph 163). It would be disproportionate to require intrusive pre-determination trenching, which would have the potential to cause unnecessary harm to such remains and would be contrary to Paragraph 217. An appropriate scheme of localised trial trenching (e.g., of areas of greater anticipated impact) could be appropriately secured by planning condition in this instance.

20.11 Overall, the County Archaeologist have not objected to the proposal and outlined that should the LPA be minded to grant planning permission for this scheme, without further archaeological investigation pre-determination, a programme of archaeological works should be secured and implemented by means of a suitably worded condition attached to any grant of planning permission. This would take the form of evaluation by trial trench initially. This could be followed by further mitigation should the results of the evaluation find evidence to justify further stages.

21 **Fire Risk and Safety**

21.1 It is noted that a number of representations have raised concern with respect to the potential fire risk and resulting impact on the safety of the area. This includes concerns of the batteries catching fire, causing a thermal runway and the effects of water to manage any fire, resulting in off-site water contamination from fire water. As a result, questions have been posed as to the proposed fire suppression systems and the site's access for emergency vehicles. An overriding concern

expressed is that the BESS would represent an unacceptable safety risk to those living near the site.

21.2 National policy makes it clear that planning decisions should focus on whether a proposal represents an acceptable use of land, rather than on the security and safe operation of installations. These matters fall under separate building control and health and safety regimes, which decision makers should assume will function effectively. The government maintain that BESS developments are covered by a robust regulatory framework. The House of Commons published a Research Briefing on BESS developments (23 June 2025)[3] that, amongst other things, addresses safety concerns. This outlines that there are two documented incidents in the UK, one at a facility in Liverpool in 2020 and one at a facility under construction in Essex earlier this year. It is noted the facility under construction was quickly contained and handed back to site management within a day.

21.3 However, as the Planning Practice Guidance now directs applicants to consider guidance from the National Fire Chiefs Council, fire safety and risk management should be taken into account. On this matter, National Planning Practice Guidance (NPPG) states applicants are encouraged to engage with the relevant local fire and rescue service. This is so matters relating to the siting and location of battery energy storage systems, in particular in the event of an incident, prevention of the impact of thermal runaway and emergency services access can be considered before an application is made. This is to ensure that the fire and rescue service are given the opportunity to provide their views on the application, to identify the potential mitigations which could be put in place in the event of an incident, and so these views can be considered when determining the application.

21.4 Applicants are also encouraged to consider guidance produced by the National Fire Chiefs Council. These are guidelines only they are not mandatory requirements. The NFCC has published updated guidance for fire and rescue services on the planning of grid-scale battery energy storage systems (BESS). The guidance is intended to assist fire and rescue services in understanding the operational pre-planning requirements associated with BESS proposals in their area. It supersedes the original guidance issued in 2023 and seeks to promote a more consistent approach by fire and rescue services when considering such developments.

21.5 The Fire Verification and Compliance Report concludes that the proposed Wheaten Hill battery energy storage scheme is acceptable in principle from a fire safety perspective, subject to appropriate safeguards. It finds that the development aligns broadly with current National Fire Chiefs Council (NFCC) guidance and industry standards, and that fire-related risks can be reduced to a low and manageable level.

[3] https://commonslibrary.parliament.uk/research-briefings/cbp-7621/

21.6 However, the report stresses that the scheme remains at an early (outline) stage, with key aspects such as battery technology, detailed layout, and safety systems not yet finalised. Because of this, a full technical assessment cannot yet be completed. The conclusions are therefore conditional, reflecting the normal position for projects at the planning stage where detailed design follows consent.

21.7 A central finding is that compliance and safety will depend on the preparation and approval of a Detailed Battery Safety Management Plan (DBSMP). This document is expected to set out the final specifications, testing standards, fire detection and suppression systems, and emergency procedures. Once this is in place, the report considers that all major fire risks including thermal runaway, fire spread, and off-site impacts can be mitigated too as low as reasonably practicable.

21.8 Overall, there are no fundamental fire safety barriers to the development proceeding. The report confirms that, with the recommended measures, conditions, and ongoing liaison with the Fire and Rescue Service, the site should achieve compliance with relevant regulations and operate safely. In planning terms, the proposal can therefore be regarded as acceptable subject to detailed design and secured conditions post-consent.

21.9 As part of the objections to the application a Technical Note has been produced by Kalco this focuses primarily on the absence of a quantitative assessment of fire emissions and their potential impacts on human health, particularly from toxic gases such as hydrogen fluoride, and the potential for effects on nearby receptors including residential properties, a public right of way, and adjacent land uses. Concern is also raised regarding the potential for thermal runaway and fire spread between containers, the duration and extent of smoke plumes, and whether sufficient evidence has been provided at application stage to demonstrate that risks are acceptable. The objector therefore considers that further detailed dispersion modelling and assessment should be undertaken prior to determination.

21.10 In response, the applicant's fire consultant (Greenfire Solutions) disputes these concerns, stating that they are based on conservative assumptions and do not reflect current industry practice or technological advances in battery storage systems. The response highlights that modern BESS schemes incorporate multiple layers of safety (including monitoring, containment, and suppression systems), that incident rates are very low, and that real-world evidence indicates emissions from any fire event are typically localised and short-lived. It also emphasises that the proposed separation distances to receptors are well in excess of typical guidance, and that the likelihood of significant off-site effects is therefore limited.

21.11 The applicant further contends that the objection misunderstands the planning process, noting that detailed technical matters such as hazard mitigation analysis, fire testing evidence, and emergency response planning are normally secured through planning conditions and developed at the detailed design stage, in consultation with the Fire and Rescue Service. It is argued that this staged approach is consistent with national guidance and standard practice for BESS developments, allowing schemes to incorporate the most up-to-date technology and safety standards at the point of implementation

21.12 In conclusion there is no compelling evidence to demonstrate that the facility would be hazardous or incompatible with its location within the open countryside. The Framework makes it clear that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions…Planning decisions should assume that these regimes will operate effectively (para 201).

21.13 Moreover, it is guidance from the NFCC it is clear that HWFS have taken this into account and then deployed their site specific and local area knowledge. In the unlikely event of a fire, the facility would be readily accessible by a fire tender and HWFS has raised no concerns in this regard subject to relevant conditions. HWFS has confirmed that it would work with the developer as the project develops to ensure that it complies with the statutory responsibilities that the Service enforce. As such, there is no clear reason within the submitted evidence that illustrates why the facility would be especially vulnerable to the risk of fire.

21.14 Overall, Officers are content that the details submitted within the planning application would satisfy any concerns with regards to fire safety and would not result in a reason for refusal of the application. The conditions requiring the submission of a Fire Mitigation, Verification and Compliance Report and updated Battery Safety Management Plan would ensure that the development would be acceptable from a fire safety perspective, with these matters further addressed under separate building control and health and safety regimes.

22 Planning and Heritage Balance

22.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

Benefits of the Development

Energy storage

22.2 Planning policy at the national level support the delivery of major energy infrastructure and renewable energy projects with battery storage facilities being

an integral part of the overall strategy to deliver a range of renewable technology installations. The development of energy storage facilities allow the local Grid network to operate more efficiently; taking excess energy, storing it and releasing it onto the network when the grid needs it at times of peak demand. In summary, they such storage supports energy security. The site would directly contribute to the government's aim to achieve the UK's carbon net zero targets to limit the impacts of global warming. The Framework directly ties planning decisions to the UK's 2050 net zero targets and energy security. This change reinforces the importance of renewable energy in achieving the UK's decarbonisation targets. Overall, it is considered that the benefits on energy security secured by the BESS and the ability of the scheme to provide energy to the wider network is attributed significant weight.

Biodiversity Net Gain (BNG)

22.3 There would be 16.8% uplift in habitat units, 12.9% in hedgerow units and 19.9% in watercourse units. The proposals exceed the statutory 10% gain requirement. Achieving a BNG assists with reversing a national decline in biodiversity, significant positive weight is afforded to this benefit.

Economic benefits

22.4 Paragraph 85 of the Framework highlights that planning policy and decisions should place significant weight on the need to support economic growth and productivity, identifying that Britain should capitalise on areas where it can be a global leader in innovation, and address any challenges for the future. The U.K.'s Modern Industrial Strategy (2025) presents plan to deliver certainty and stability; encourage investment in high growth sectors; and drive the UK's growth mission. The strategy sets out a commitment to achieve sustainable growth in alignment with Net Zero and wider environmental objectives. It also outlines the ambition for the UK to be a global climate leader and build a strong and sustainable economy, creating good, well-paid jobs in the green sectors of today and of the future. The Industrial Strategy identifies eight growth-oriented sectors, which include Clean Energy industries. The strategy highlights that Clean Energy industries are a major driver of global growth and that there is global demand for low-carbon products.

22.5 The proposal would provide some benefits by providing employment opportunities in the construction phase and additional more limited employment opportunities during the operational phases in addition to generally contributing to sustaining jobs in the wider power industry. Local businesses would benefit from a temporary short-lived increase in demand as a result of expenditure by direct and indirect workers during the construction/installation phase. This economic benefit is given limited weight in the overall planning balance given the small quantity of jobs it would create.

22.6 During the operational phase, the energy storage sector supports employment across a host of occupations, in professional, scientific and technical activities. The delivery of a new Energy Storage System would support these sorts of opportunities offsite. The additional direct employment supported, as well as the energy produced/stored by the proposals, could also be expected to make a positive contribution towards local economic output, measured on the basis of Gross Value Added (GVA). Moderate positive weight is afforded to the economic benefits of the proposal.

Harm

22.7 The proposal would give rise to landscape and visual harm, particularly during construction and early operational phases, through the introduction of utilitarian infrastructure into a rural landscape. These effects are identified as moderate adverse initially and then reducing to minor adverse or negligible over time with mitigation planting. The Council's development plan (Policy 16) seeks to protect landscape character, and as such some conflict with development plan policy is identified. While the change to the landscape character of the area would be significant, the weight given to this harm is moderated by the proposed mitigation. This conflict can be afforded moderate weight.

22.8 The development would also result in:

- Limited noise and amenity impacts,
- Minor tree loss, offset through replacement planting

22.9 These impacts are localised, mitigated and reversible, and therefore attract limited weight in the planning balance.

22.10 There would be harm caused to the setting of designated heritage assets, which is at the lower end of the less than substantial scale. This harm is caused due to a change of land use within the wider setting of these assets, and resultant urbanising effect on what is currently an open rural setting. Whilst Officers consider that in terms of the heritage balance, the harm caused to the setting of the heritage assets would be outweighed by the public benefits of the proposal, and therefore the heritage balance as required in the Framework has been satisfied, the harm identified would still fall to weigh against the development in the overall planning balance. Limited weight is assigned to this harm.

22.11 Cumulative effects have also been considered. Whilst there is potential for additional impacts in the vicinity of the substation, this indicates that the effects would be localised, the intervisibility is limited between schemes and the overall additional harm remains minor adverse. Accordingly, cumulative impacts do not materially alter the conclusions on acceptability.

23 Conclusion in a scenario where the development accords with Framework paragraph 155 (Grey Belt).

23.1 This proposal would utilise Grey Belt land and having regard to the provisions of Framework paragraph 155, the development would not comprise inappropriate development in the GB. The great weight attached to the contribution to mitigating climate change and to energy security, albeit temporary, the potential for permanent BNG and landscape enhancements and the moderate weight the economic benefits generated by the proposal outweighs the temporary Moderate/Minor adverse landscape and visual effects, the less than substantial harm to heritage asset and the other lesser harms identified. Subject to the imposition of conditions, the proposal would not conflict with the development plan when read as a whole or the Framework.

Conclusion in the scenario where the development would be inappropriate development in the Green Belt

23.2 Framework paragraph 153 requires the decision maker to give substantial weight to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

23.3 The great weight attached to the contribution to mitigating climate change and to energy security, albeit temporary, the significant weight to the absence of alternative sites, the potential for permanent BNG and landscape enhancements and the moderate weight the economic benefits generated by the proposal outweighs the temporary Moderate/Minor adverse landscape and visual effects, the less than substantial harm to heritage asset. Accordingly, taking the case as a whole, very special circumstances exist which justify the development.

23.4 Officers conclude that the benefits of this proposal, clearly outweigh the harm to the Green Belt and the other harms identified such that very special circumstances exist to justify this proposal. Subject to the imposition of conditions, the proposal would not conflict with the development plan when read as a whole or the Framework.

24 Conclusion

24.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out that in considering planning applications the determination must be made in accordance with the development plan unless material considerations indicate otherwise. This is re-iterated within paragraphs 12 and 48 of the Framework. Having regard to all the above, the proposed development has been found to comprise Grey Belt land

and is therefore considered to be acceptable in principle. It will provide renewable energy infrastructure and BNG enhancements on site while the moderate/minor adverse landscape impact is identified and the less than substantial harm to heritage assets.

24.2 There are considered to be no technical reasons to withhold planning permission. In weighing together all relevant factors, the proposal is considered to constitute sustainable development as defined within the Framework and is considered to be acceptable when assessed against the aforementioned national planning guidance and local planning policy.

24.3 As such, it is recommended that committee endorse the recommendation to grant planning permission subject to conditions.

RECOMMENDATION:
That having regard to the development plan and to all other material considerations, planning permission be GRANTED subject to the following conditions:

Conditions:

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the grant of this permission.

   Reason: In accordance with the requirements of Section 91(1) of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in accordance with the following documentation, plans and drawings:

   WHEA - LOCATION PLAN A001 - V6.0
   WHEA - OVERALL LAYOUT B001 - V2.8 - PLANNING
   WHTN - 400KV SUBSTATION AREA LAYOUT B009 - V1.2
   WHTN - 400KV SUBSTATION CUT AND FILL B151 - V1.0
   WHTN - 400KV TRENCH CROSS SECTION B146 - V1.0
   WHTN - BATTERY CONTAINER FOUNDATIONS AND ELEVATIONS PLANNING B202 - V1.0
   WHTN - BESS ACCESS TRACK CROSS SECTION B107 - V1.0
   WHTN - BESS CCTV ELEVATION PLANNING B205 - V1.0
   WHTN - BESS CUSTOMER SUBSTATION FOUNDATIONS AND ELEVATIONS PLANNING B209 - V1.0
   WHTN - BESS HV SUBSTATION FOUNDATIONS AND ELEVATIONS PLANNING B210 - V1.0
   WHTN - BESS INTERNAL SERVICE TRACK CROSS SECTION B215 - V1.0
   WHTN - BESS INTERNAL SURFACE CROSS SECTION B216 - V1.0

WHTN - BESS LOCAL SUPPLY TX FOUNDATIONS AND ELEVATIONS PLANNING B208 - V1.0
WHTN - COMPOUND AREA LAYOUT B104 - V1.0
WHTN - PCS FOUNDATIONS AND ELEVATIONS B211 - V1.0
WHTN - SITE ENTRANCE GATES ELEVATION STEEL PLANNING B204 - V1.0
WHTN - SITE PALISADE FENCING ELEVATIONS PLANNING B203 - V1.0
WHTN - SPARES CONTAINER FOUNDATIONS AND ELEVATIONS PLANNING B116 - V1.0
WHTN - WATER SUPPLY TANK ELEVATIONS PLANNING B147 - V1.0

Reason: To provide certainty to the extent of the development hereby approved in the interests of proper planning/

3. The development hereby granted shall be limited to a period of 40 years from the date when electricity is first exported from the approved BESS to the electricity network. Written confirmation of the first export date shall be given to local planning authority within 14 days of the first export date.

   Within 40 years following the first export date of the development hereby permitted, the batteries, transformer units, inverters, all associated structures and fencing approved shall be dismantled and removed from the site. The developer shall notify the Local Planning Authority in writing no later than twenty-eight working days following cessation of power production. In the event of a cessation of operations of the electricity storage facility for a period of 6 months, the scheme approved under condition 4 shall be fully implemented and all plant, machinery and structures associated with the development (including the internal haul roads) shall be removed from site. The electricity storage facility shall not be re-created under the terms of this planning permission.

   Reason: To provide for the completion of operations and restoration of the site at the earliest opportunity within the project timescale, in the interests of amenity, minimising the duration of any adverse impacts.

4. Within 12 months of operational use of the site hereby approved, a Decommissioning Method Statement including a scheme of restoration for the removal of the Battery Energy Storage Facility, subject of this planning permission, and any associated equipment shall be submitted to and approved in writing by the Local Planning Authority. The restoration scheme shall be in accordance with this approved plan, the approved decommission general arrangement plan and the site restored in accordance with the decommission soft landscaping plan.

   Reason: To ensure that the site is restored and reclaimed to minimise the duration of adverse impacts and the protection of the countryside.

5. Prior to above ground works, full details of the facing colours of all the following structures: fencing, battery units, buildings, tanks and CCTV poles, shall be

submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and retained thereafter.

Reason: To ensure the development would integrate, respect and complement the character of the area and wider landscape.

6. A Construction Environmental Management Plan (CEMP) shall be submitted to and approved by the LPA prior to commencement of the works. The CEMP shall be designed to mitigate potential construction phase impacts on ecological features, including but not limited to designated sites, notable habitats, great crested newts and other amphibians, bats, birds, badgers, otters, hedgehogs, brown hare and reptiles.

   Reason: To minimise negative impacts on ecological receptors during construction.

7. No lighting shall be installed until a sensitive lighting plan has been produced and approved by the LPA.

   Reason: To avoid light spill onto retained trees, hedgerows and watercourses, during both construction and operation of the site, thereby minimising potential negative impacts of lighting on bats, birds, badgers, otters and other species that are active at night.

8. The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), has been prepared in accordance with Biodiversity Metric Report and approved by the LPA. The HMMP must include:

   - A non-technical summary;
   - The roles and responsibilities of the people or organisation(s) delivering the HMMP;
   - The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the Biodiversity Gain Plan;
   - The management measures to maintain habitat in accordance with the Biodiversity Gain Plan for a period of 30 years from the completion of development; and
   - The monitoring methodology and frequency of reporting in respect of the created or enhanced habitat to be submitted to the LPA has been submitted to and approved in writing by the LPA.

   Once approved, the created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP for a period of 30 years from completion of development.

Reason: To secure the delivery of ecological enhancement.

9. Notice of the following elements, set out in the HMMP, shall be given in writing to the LPA within 14 days of such completion:

   - Completion of habitat creation and enhancement works;
   - Monitoring reports, in accordance with the methodology and frequency specified in the approved HMMP; and
   - Verification of achieving targeted habitat condition of each habitat type, once target condition is achieved.

   Reason: To secure the delivery of ecological enhancement.

10. No development shall take place until the tree protection measures as set out in the Arboricultural Method Statement have been implemented. The tree protection fencing shall be erected in accordance with BS 5837: 2012 and retained throughout the construction phase until completion of the development. Should any pruning to retained trees be necessary to facilitate the development, they are to be done in accordance with BS3998:2010.

    Reason: As this matter is fundamental to protecting the trees which are to be retained on the site during construction works in the interest of the visual amenities of the area.

11. No development above ground level shall take place until a scheme of soft landscaping for the site drawn to a scale of not less than 1:200 has been submitted to and approved in writing by the Local Planning Authority. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

    Reason: To enable the development to respect, complement and positively integrate into the character of the area.

12. No development above ground level shall take place until details of a hard landscaping scheme for the site have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing any earthworks and / or mounding; surfacing materials; boundary treatments and means of enclosure; car parking layouts; other

vehicle and pedestrian access, circulation / turning areas; hard surfacing materials; minor artefacts and structures (for example outdoor seating areas, cycle storage, refuse / recycling, storage units, and similar features, etc); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features); retained historic landscape features and proposals for restoration where relevant. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

Reason: To enable the development to respect, complement and positively integrate into the character of the area.

13. No development above ground level shall take place until a Landscape Management Plan, including long term design objectives, management responsibilities and maintenance schedules and periods for all soft landscape areas together with a timetable for the implementation of the landscape management plan, has been submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out in accordance with the approved details and timetable.

Reason: To enable the development to respect, complement and positively integrate into the character of the area.

14. No development shall take place until a programme of archaeological work including a Written Scheme of Investigation, has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and:

a) The programme and methodology of site investigation and recording.
b) The programme for post investigation assessment.
c) Provision to be made for analysis of the site investigation and recording.
d) Provision to be made for publication and dissemination of the analysis and records of the site investigation
e) Provision to be made for archive deposition of the analysis and records of the site investigation
f) Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

Reason: In accordance with the requirements of paragraph 218 of the National Planning Policy Framework.

15. The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (14) and

the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: In accordance with the requirements of paragraph 218 of the National Planning Policy Framework.

16. Prior to first operation of the site equipment a noise impact assessment detailing the actual plant noise emissions, shall be submitted to the local planning authority for approval. This shall include proposals for verification testing the noise levels within 6 months of first operating the equipment. The noise emissions shall not exceed at the façade of residential premises 40 dBLAr for day and night periods. Rating levels shall be freefield from direct measurement and extrapolation and in accordance with BS 4142:2014+A1:2019: or its successor. Where levels are shown to exceed these levels, further mitigation measures shall be submitted and approved by the local planning authority and installed within an agreed timescale.

Reason: To safeguard the amenities of the locality.

17. No works in connection with site drainage shall commence until a scheme for a surface water drainage strategy for the proposed development has been submitted to, and approved in writing by the Local Planning Authority. The strategy shall include details of surface water drainage measures, including for hardstanding areas, and shall include the results of an assessment into the potential of disposing of surface water by means of a sustainable drainage system (SuDS). The scheme should include run off treatment proposals for surface water drainage. The approved surface water drainage scheme shall be implemented prior to the first use of the development and thereafter maintained in accordance with the agreed scheme.

Reason: In order to ensure satisfactory drainage conditions that will not create or exacerbate flood risk on site or within the surrounding local area.

18. Prior to the first use of the approved development, a management plan detailing future maintenance responsibilities for SuDS assets shall be submitted to and approved in writing by the Local Planning Authority. The approved management plan shall be implemented prior to the first use of the development and thereafter maintained.

Reason: To prevent the increased risk of flooding and to protect water quality.

19. The development hereby approved shall not commence construction until details of the proposed Salt Way site access have been submitted to and improved in writing by the Local Planning Authority, in consultation with the Local Highway Authority. The details shall include but not be limited to (i) access width, (ii) surfacing, (iii) access radii, (iv) gate position, (v) position of any temporary overrun matting.

Reason: In the interests of highway safety.

20. Development shall not begin until appropriate visibility splays are provided from a point 0.6m above carriageway level at the centre of the Salt Way access to the application site and 2.4m back from the near side edge of the adjoining carriageway, (measured perpendicularly), for a distance of Y metres in each direction measured along the nearside edge of the adjoining carriageway and offset a distance of 0.6m from the edge of the carriageway. The Y dimensions shall be agreed and approved in writing by the Local Highway Authority. Nothing shall be planted, erected and/or allowed to grow on the triangular area of land so formed which would obstruct the visibility described above.

Reason: In the interests of highway safety.

21. The development hereby approved shall not commence construction until a pre-construction highway condition survey has been undertaken to the satisfaction and approval of the Local Planning Authority, in consultation with the Local Highway Authority. The extent of the survey shall be agreed and approved in writing, prior to being undertaken. A copy of the survey shall be issued to the Local Highway Authority, as an approved record. Upon completion of the development construction phase, a follow-up condition survey shall be undertaken to the satisfaction of the Local Highway Authority.

Reason: To ensure integrity of the local highway network is maintained, in the interests of highway safety.

22. The development hereby approved shall not commence construction until a Cable Route Assessment Report has been undertaken and submitted to the Local Planning Authority for approval in writing, in consultation with the Local Highway Authority. The report shall set out details of the finalised route of the external cable connection, method of laying and associated temporary traffic management arrangements, together with details of construction of the grid connection facility and its access from the public highway.

Reason: In the interests of highway safety.

23. No part of the approved development shall begin construction until vehicle wheel cleansing facilities have been installed and brought into operation on the site, the design and siting of which shall be subject to the prior approval of the Local Planning Authority, in consultation with the Local Highways Authority.

Reason: In the interests of highway safety.

24. The development hereby approved shall not commence construction until a finalised Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority.

    Reason: In the interest of highway safety.

25. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported immediately to the Local Planning Authority. The applicant is advised to immediately seek the advice of an independent geo-environmental consultant experienced in contaminated land risk assessment, including intrusive investigations and remediation.

    No further works should be undertaken in the areas of suspected contamination, other than that work required to be carried out as part of an approved remediation scheme, unless otherwise agreed by the Local Planning Authority, until requirements 1 to 4 below have been complied with:

    1. Detailed site investigation and risk assessment must be undertaken by competent persons in accordance with the Environment Agency's 'Land Contamination: Risk Management' guidance and a written report of the findings produced. The risk assessment must be designed to assess the nature and extent of suspected contamination and approved by the Local Planning Authority prior to any further development taking place.
    2. Where identified as necessary, a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to identified receptors must be prepared and is subject to the approval of the Local Planning Authority in advance of undertaking. The remediation scheme must ensure that the site will not qualify as Contaminated Land under Part 2A Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
    3. The approved remediation scheme must be carried out in accordance with its terms prior to the re-commencement of any site works in the areas of suspected contamination, other than that work required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority.
    4. Following completion of measures identified in the approved remediation scheme a verification report that demonstrates the effectiveness of the remediation carried out must be produced and is subject to the approval of the Local Planning Authority prior to the occupation of any buildings on site.

    Reason: To ensure that the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property, and ecosystems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

26. No development shall take place until a scheme to dispose of surface water and any contaminated drainage from fire suppression has been submitted to and approved in writing by the Local Planning Authority (in consultation with Hereford and Worcester Fire and Rescue Service).

A construction phase Surface Water Management Plan (SWMP) should also be submitted and agreed to ensure that surface water run-off and contamination is temporarily intercepted, stored, treated, and discharged from the site during construction of the scheme.

A management and maintenance plan shall be submitted to ensure surface water drainage systems are maintained and managed for the lifetime of development, including the name and contact details of the body(-ies) responsible.

The scheme shall include:
a) details of any fire prevention systems;
b) evidence of agreement with the Hereford and Worcester Fire and Rescue Service to confirm the expected volume and nature of contaminated water which would need to be managed in the event of a fire on the site (subject to an approved fire incident response plan being agreed);
c) details of the nature of any contaminants which could be present from a failure and leak from the batteries and/or transformer(s) on site;
d) details of fire water containment systems and how these will be designed to prevent infiltration and/or isolated to prevent direct discharges of contaminants to surface water outfalls;
e) details of SUDS features and how these will be constructed to prevent the infiltration of contaminated water to ground (e.g. the proposed permeable hardcore will need to be lined to prevent infiltration);
f) details of how the drainage system will be designed such that it is resistant to damage and corrosion that may occur during a fire incident;
g) a management and maintenance plan to ensure that all drainage features, including penstock valves are maintained and functional throughout the life of the development. This should include plans for replacement and repair of elements that may be damaged as a result of a fire incident;
h) evidence that a plan is in place, including the name and contact details of the body(-ies) responsible, to remove and safely dispose of any contaminated water stored on site in the event of an incident, including fire.

Reason: To ensure potential hazards and details of mitigation measures reduce environmental hazards to an acceptable level.

27. No battery unit or associated electrical equipment shall be brought on the site until a Detailed Battery Safety Management Plan (DBSMP) for the development has been submitted to and approved in writing by the Local Planning Authority (following consultation with Hereford and Worcester Fire and Rescue Service).

The DBSMP shall align with the general principles set out within the Outline Battery Safety Management Plan and shall include details of safety measures and risk mitigation across the construction, operational, and decommissioning phases of the development. The development shall be carried out and maintained for the duration of the permission in accordance with the approved DBSMP. This plan shall be guided by the applicant's submitted Fire Safety Strategy and the Grid scale battery energy storage system planning - Guidance for Fire and Rescue Services published by the National Fire Chiefs Council (or any subsequent update and references).

Reason: To ensure potential hazards and details of mitigation measures reduce environmental hazards to an acceptable level.

28. No battery unit or associated electrical equipment shall be brought on the site until a site specific Emergency Response Plan shall be submitted and approved in writing by the Local Authority (following consultation with Hereford and Worcester Fire and Rescue Service). The Emergency Response Plan shall be developed using best practice guidance as detailed and required in the published Grid Scale Battery Energy Storage System planning - Guidance for FRS published by the National Fire Chiefs Council(or any subsequent update and references). The development shall be carried out and thereafter operated only in accordance with the approved site specific Emergency Response Plan.

The site specific Emergency Response Plan should cover as a minimum;
a) Hazard Information;
b) Response Procedures;
c) Environmental Impact Mitigation;
d) Post Incident Operations;
e) Communication and Notification;
f) Command & Control;
g) Training & Exercising Responsibilities;
h) All relevant site specific information.

Reason: To ensure potential hazards and details of mitigation measures reduce environmental hazards to an acceptable.

Informatives

Biodiversity Net Gain

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition '(the biodiversity gain condition)' that development may not begin unless:
(a) a Biodiversity Gain Plan has been submitted to the Planning Authority, and
(b) the Planning Authority has approved the plan.

The Planning Authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Redditch Borough Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024. Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

2. In accordance with Schedule 7A (13) of The Town and Country Planning Act 1990 no development shall commence until a Biodiversity Gain Plan has been submitted to the planning authority, and the planning authority has approved the plan. In order to formally submit the Biodiversity Gain Plan to Redditch Borough Council please submit a Discharge of Conditions application. It is recommended that you complete and submit the template on the following link as part of your Biodiversity Gain Plan:

https://www.gov.uk/government/publications/biodiversity-gain-plan

A Biodiversity Gain Plan submission should include the following (where relevant):
a) The completed metric calculation tool showing the calculations of the predevelopment and post-intervention biodiversity values
b) Pre and post development plans drawn to an identified scale and showing the direction of North
c) Legal agreement
d) Commitment to deliver and maintain BNG for a minimum of 30 years from the date of completion of the development (for onsite) or from the date that BNG has been completed (offsite)
e) Habitat Management and Monitoring Plan (HMMP) in line with the HMMP template or HMMP checklist, concurrent with planting plans or other landscape management plans.
f) Compensation plan (if affecting irreplaceable habitats)
g) BNG register reference numbers (if using off-site units)
h) Proof of purchase (if buying statutory biodiversity credits)

Public Rights of Way

The Applicant should be aware of the Department of Environment Circular 1/09 (part 7) which explains that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and that the grant of planning consent does not entitle developers to obstruct a public right of way.

The Applicant should note the National Planning Policy Framework published by

the Ministry of Housing, Communities and Local Government, particularly paragraph 98, to ensure that planning policies protect and enhance public rights of way and access.

The Definitive Map is a minimum record of public rights of way and does not preclude the possibility that unrecorded public rights may exist, nor that higher rights may exist than those shown.

Where any Public Right of Way is affected, the applicant must adhere to the following obligations:-

- No disturbance of, or change to, the surface of the path or part thereof should be carried out without our written consent.
- No diminution in the width of the right of way available for use by the Public.
- Building materials must not be stored on the right of way.
- Vehicle movements and parking to be arranged so as not to unreasonably interfere with the public's use of the right of way.
- No additional barriers are placed across the right of way. No stile, gate, fence, or other structure should be created on, or across, a public right of way without written consent of the Highway Authority; and
- The safety of the public using the right of way is to be ensured at all times.

Construction Traffic Management Plan (CTMP)

It is expected that contractors are registered with the Considerate Constructors scheme and comply with the code of conduct in full, but particular reference is made to "respecting the community" this says:-

Constructors should give utmost consideration to their impact on neighbours and the public:-

- Informing, respecting, and showing courtesy to those affected by the work.
- Minimising the impact of deliveries, parking, and work on the public highway.
- Contributing to and supporting the local community and economy.
- Working to create a positive and enduring impression and promoting the Code.

The CTMP should clearly identify how the principal contractor will engage with the local community. This should be tailored to local circumstances. Contractors should also confirm how they will manage any local concerns and complaints and provide an agreed Service Level Agreement for responding to said issues.
Contractors should ensure that courtesy boards are provided and information shared with the local community relating to the timing of operations and contact details for a site coordinator in the event of any difficulties.
This does not offer any relief to obligations under existing Legislation.

Extraordinary Maintenance

The attention of the applicant is drawn to Section 59 of the Highways Act 1980 which allows the Highway Authority to recover additional costs of road maintenance due to damage by extraordinary traffic.

Before any work is commenced upon the development hereby approved representatives of Worcestershire County Council, as the Highway Authority and the applicant, shall carry out a joint road survey/inspection on the roads leading to this site. Any highlighted defects shall be rectified to the specification and satisfaction of the Highway Authority before work is commenced on the development hereby approved. A further joint survey/inspection shall be undertaken following completion of development hereby approved and any necessary remedial works shall be completed to the specification and satisfaction of the Highway Authority within one month or other agreed timescale.

Section 50 Licence

A S50 Licence, relevant to the New Roads and Street Works Act 1990, must be obtained from Highways Network Management prior to undertaking the laying or alteration of any apparatus within the adopted public highway by any person or body that is not a statutory undertaker.

Section 171 Licence

A S171 Licence, relevant to the Highway Act 1980, must be obtained from Highways Network Management prior to undertaking any works within or excavation of the adopted public highway.

Temporary Traffic Management

Any temporary traffic management measures placed on a public highway require prior approval and agreement from the Highway Authority. This requires a temporary traffic management application to be submitted well in advance of the works commencing. Road or footway closures, speed restrictions or convoy working require legal orders, which have a minimum 12-week lead-in time.
The Applicant shall discuss proposed temporary traffic measures with the Highway Authority, providing drawings showing suggested proposals and locations of temporary measures. Discussions will agree what appropriate measures shall be implemented and their details.

Procedural matters
This application is reported to Planning Committee for determination because the application is for major development (more than 1000 sq metres of new commercial / Industrial floorspace), and as such the application falls outside the scheme of delegation to Officers.

REDDITCH BOROUGH COUNCIL

PLANNING COMMITTEE