DWD

Green Belt Assessment Report

NORTH CRAY ROAD

ENERGY STORAGE SYSTEM (ESS)

Land at North Cray Road, Sidcup

69 Carter Lane
London EC4V 5EQ

T: 020 7489 0213
F: 020 7248 4743
E: info@dwd-ltd.co.uk
W: dwd-ltd.co.uk

April 2025
Ref: 17947

CONTENTS

TABLES

FIGURES

Revision	Description	Originated	Checked	Reviewed	Authorised	Date
1.0	FINAL	CD	CD	RB	RB	April 2025
DWD Job Number: 17947						

1.0 INTRODUCTION

1.1 This Green Belt Assessment Report (the 'Report') has been prepared in support of an application for full planning permission submitted to London Borough of Bexley ('LB Bexley') under the provisions of the Town and Country Planning Act 1990 (as amended) on behalf of Net Zero Thirty Two Ltd (the 'Applicant', with the application being managed by Firstway Energy).

1.2 The Report considers the Site's potential to be classified as 'Grey Belt' as defined in the NPPF, and to assess whether future development of the Site as an Energy Storage System ('ESS') would be regarded as 'not inappropriate' development under the Grey Belt exception in Paragraph 155 of the NPPF. Consideration is given to the impact of the Proposed Development on the spatial and visual openness of the Green Belt, in the event that decision makers in LBB disagree that the Site is a Grey Belt exception. In such instances, the Proposed Development would be considered inappropriate development and the harm to the Green Belt would need to be weighed in the planning balance along with the very special circumstances for the development within the Green Belt.

1.3 The Proposed Development comprises the construction and operation of an ESS, including storage units, an associated substation (transformers and switchgear), site fencing, access track on land at North Cray Road, Sidcup. Included within the proposals is a cable connection route to be buried within greenfield land under the control of the Applicant and under the public highway between the ESS and its point of connection at an existing National Grid substation located 1.45 kilometres ('km') to the north-east. The Proposed Development will take electricity from the National Grid Electricity Transmission when demand is low, or supply is high and feed it back to the grid when supply is low, or demand is high. The ESS would have a capacity of up to 200 Megawatts ('MW'). The Proposed Site, including all physical infrastructure, is located within the administrative area of LB Bexley.

1.4 The proposed site (the 'Site') covers an area of approximately 9.44 hectares ('ha') and comprises the Main site where the ESS compound is proposed to be located ('Main Site'), which is 7.0 ha in size, a primary access track linking it to North Cray Road, and the underground cable corridor which continues through greenfield land, along North Cray Road, A223, A2018 and Stable Lane until it reaches land owned by National Grid. The Site (ESS compound and access) comprises greenfield land which is not currently in use, and which is located within the Metropolitan Green Belt.

1.5 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050 and a related political target of 2030 for a net zero electricity system. This

requires major investment in proven technologies, such as low carbon and renewable energy and energy storage, which is supported by planning policy at local and national level and the London Plan. Energy storage proposals, such as the Proposed Development, help to support the development of renewable energy, which is intermittent by its nature, taking energy from the grid at times of higher supply/lower demand and feeding it back at times of lower supply/higher demand. This added flexibility is key if the UK is to achieve widescale reliance on renewable energy. As such, the principle of development is heavily supported by both local and national policy, and the London Plan.

1.6 Planning permission is being sought to operate for 40 years, at which point the Site would be decommissioned and the land returned to its previous state.

The Applicant

1.7 Firstway Energy is a UK based energy storage developer with a portfolio of sites across England and Wales. Firstway Energy's ethos is to provide utility scale energy storage systems to support the UK's transition to Net Zero. Firstway Energy carefully select sites with low material impacts, particularly visual, and work closely with local communities to be a good neighbour before, during and after installation.

The Site and Surrounding Area

1.8 The Site is made up of greenfield land which is currently in agricultural use, and which is located within the Metropolitan Green Belt. The Site is located to the east of Sidcup and Foots Cray. The Site covers an area of approximately 9.44 ha. The Main Site covers an area of 7.0 ha is bound to the north, west and east by agricultural fields / undeveloped land, and to the south by polytunnels as well as the adjoining agricultural fields, which is characterised by large industrial and agricultural-type buildings.

1.9 Proposed at the Site is an ESS compound, access tracks connecting the ESS site to North Cray Road, and an underground cable corridor to the point of connection ('POC') to the electricity grid, being an existing National Grid substation. The underground cable corridor runs through greenfield land within the control of the Applicant and under the public highway between the ESS and its point of connection at an existing National Grid substation (the Hurst Substation) located 1.45 km north-east of the Main Site.

1.10 The surrounding area is characterised by a mix of residential areas within the London Borough of Bexley, industrial areas and business parks, equestrian uses, Stone Hill woods and Joyden's Wood, and other agricultural / undeveloped land in the London Area Metropolitan Green Belt. It is also

characterised by existing large scale agricultural buildings with polytunnels adjoining to the south and road infrastructure such as the A223 to the west and B2173 to the south. The Hurst Grid Substation is approximately 1.45km to the north-east of the Main Site. The River Cray also lies further afield 1.4km to the south-west of the Main Site.

1.11 The closest residential areas are located approximately 300 m north which also includes a riding school and stables and Yashu Farm, with Chalkwood Farm approximately 400 m to the east. Residential properties lie to the west and south with the A223 and B2173 further beyond in the west and south, respectively.

1.12 A review of the LB Bexley Local Plan Policies Map and the Government's MAGIC Mapping software has confirmed that the Main Site itself is not covered by or is adjacent to any environmental or heritage designations. The Main Site is within the Impact Risk Zone for the Ruxley Gravel Pits Site of Special Scientific Importance ('SSSI'). Further to this, the Main Site is also located entirely within the Metropolitan Green Belt and the north-eastern corner is within a Mineral Safeguarding Area, both of which are non-statutory designations.

1.13 The Main Site is entirely located in Flood Zone 1, the area at lowest risk of flooding.

1.14 Full details of any relevant planning, heritage and environmental designations are set out in Section 2 of the accompanying 'Planning, Design and Access Statement' in support of the Proposed Development. This includes the planning, heritage and environmental designations in proximity to the access track and underground cable route corridor.

The Proposed Development

1.15 This application seeks full planning permission for the 'Proposed Development' which comprises the following:

- The erection of up to 200 energy storage units (7.81m (L); 1.72m (W); and 2.8m (H)), each comprising lithium-ion battery cells complete with an energy storage management system and mechanical ventilation, and transformers which are to be connected to each energy storage unit within the proposed ESS compound, also including:
  - electrical cabling and electrical connection corridor to 132kV switchyard;
  - 25no. Twin Skid TX units which would be situated between 2no. Inverter Units (total of 50no. Inverter units);
  - 50no. ESS Interface cabinets;
  - 2no. Customer Switchroom;

- 1no. Storage container;
- 2no. Welfare containers;
- 132kVSubstation Compound with associated equipment and District Network Operator Control Room structure;
- site security (including fencing, security gates and CCTV);
- customer control room and;
- water hydrants and 2 x 240,000 litre water tanks.

- Other associated development works include:
  - Site preparation;
  - Provision of site access;
  - Provision of site drainage; and
  - Landscaping and biodiversity management areas on land adjoining the proposed ESS compound.

1.16 The Proposed Development benefits from proximity to the National Grid substation, from which the ESS will be connected. Where the underground cabling works reach land under the control of National Grid, including the connection works into to the existing substation, these will be undertaken using National Grid's statutory powers and therefore are not required for inclusion in the red line boundary.

1.17 It is envisaged that the output capacity of the Proposed Development would be up to 200 MW, capable of powering approximately 647,590 homes for 2 hours.

2.0 POLICY SUMMARY

2.1 This section provides a brief overview of the relevant planning policy and guidance at the local and national level, and in the London Plan. The planning application would be determined in accordance with section 70(2) of the Town and Country Planning Act 1990 (as amended), which states that in dealing with applications, local planning authorities shall have regard to the provisions of the statutory development plan and to other material considerations.

Local Policy

2.2 The Statutory Development for the administrative area of LB Bexley comprises the Bexley Local Plan (2023) and the Bexley Local Plan Policies Map (2023).

2.3 The Proposed Development is located within the Metropolitan Green Belt. Policy SP1 (Achieving sustainable development – the spatial strategy) of the Local Plan states that all new proposals for development must secure sustainable development in Bexley, where appropriate, by protecting and enhancing the natural and built environment, which includes by adapting to and mitigating the impacts of climate change, focusing new development on urban, brownfield sites in accessible locations and optimising the efficient management of existing natural resources.

2.4 Policy SP8 (Green infrastructure including designated Green Belt) states that future development must support the delivery of a high-quality, well-connected and sustainable network of open spaces by protecting the Metropolitan Green Belt from inappropriate development. It goes on to state that beneficial use of the Metropolitan Green Belt will be encouraged where opportunities for public access, outdoor sports and recreation, retaining and enhancing landscapes, visual amenity, biodiversity o to improve damaged and derelict land.

2.5 Policy DP31 (Energy infrastructure) in para 7.45 of the policy implementation states*: "Renewable energy schemes will be strongly promoted in the borough and encouraged as part of development proposals where they are effective, viable and practical. Applications for renewable energy generation will be expected to demonstrate how the proposal has been sensitively designed to integrate into the local environment, minimising any potential negative impacts, both physically and environmentally"*.

The London Plan

2.6 London Plan Policy G2 (London's Green Belt) states:

"A The Green Belt should be protected from inappropriate development:

1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,

2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

B Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan."

2.7 Part C of London Plan Policy SI 3 (Energy infrastructure) states that development plans should: "*identify the need for and suitable sites for any necessary energy infrastructure requirements, including energy centres, energy storage and upgrades to existing infrastructure…".*

National Policy

National Planning Policy Framework

2.8 The National Planning Policy Framework ('NPPF') was adopted in March 2012 and was most recently updated in December 2024 in relation to the Green Belt and the Grey Belt, amongst other matters. It sets out the Government's planning policies for England and how these are to be applied.

2.9 Paragraph 142 of the NPPF confirms that, "*the Government attaches great importance to Green Belts. 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*."

2.10 Paragraph 143 confirms the five purposes that the Green Belt serves:

- *"to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; an*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

2.11 Paragraph 153 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'.

2.12 Paragraph 153 goes on to state that:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt[55]… '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." Footnote 55 expands upon this by stating that this is other than in the case of development on previously developed land or Grey Belt land, where development is not inappropriate.

2.13 Paragraph 155 of the NPPF sets out a Framework for determining whether a site is Grey Belt and development of that site is considered to be 'not inappropriate':

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

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."

2.14 Paragraph 160 of the NPPF states, with specific regard to renewable energy proposals:

"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."

2.15 Importantly, Paragraph 160 states, only that elements of many renewable projects will comprise inappropriate development and not that renewable energy projects per se constitute inappropriate development. As such, it can be considered that the compatibility of individual renewable energy projects in the Green Belt are to be judged based on their individual merits and circumstances, and that the wider environmental benefits associated with increased production of energy from renewable sources is a key consideration.

National Planning Practice Guidance

2.16 The National Planning Practice Guidance ('NPPG') expands upon and supports the policies within the NPPF. The NPPG was first published in 2014 and has been periodically updated since, with the most recent update in February 2025.

2.17 The February 2025 updates to the NPPG 'Advice on the role of the Green Belt in the Planning System'[1] expand upon the introduction of the 'Grey Belt' in the NPPF. Paragraph: 009 (Reference ID: 64-009-20250225) states, that where Grey Belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of this guidance, on:

- whether the site strongly contributes to the Green Belt purposes a, b or d; and
- whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development; and
- whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance.

2.18 Paragraph: 010 (Reference ID: 64-010-20250225) goes on to state that where a site is judged to be Grey Belt, and to not fundamentally undermine the purposes of the remaining Green Belt across the plan area if released or developed, wider considerations will still be relevant to the consideration of development proposals on the site. These would include determining whether the development would not be inappropriate development, as set out in Paragraph 155 of the NPPF. It goes on to state that where a development is not inappropriate in the Green Belt, this does not itself remove the land from the Green Belt nor require development proposals to be approved.

2.19 It is important to recognise that energy storage systems are not an uncommon feature within the Green Belt across the UK. In many cases, such development has been allowed within the Green Belt on the basis that it is required within the national and local interest, and in London Policy, and that it has been needed in that particular location (see Table 6.2 in Section 6 of this Document). Further to this, a number of energy storage systems have been deemed as not inappropriate development, being on land considered to be within the Grey Belt, and therefore would not be regarded as

[1] Green Belt - GOV.UK

harmful to the openness of the Green Belt nor conflict with the purposes of land in the Green Belt (Refer to Table 6.2 in this Report). Both considerations apply to the Proposed Development.

2.20 The following sections are set out as follows:

- Assessment of Grey Belt and Inappropriate Development;
- Impact on the Openness and Character of the Green Belt;
- Harm and any other harm;
- Very Special Circumstances;
  - The need for renewable energy generation and its role in meeting the challenge of climate change;
  - The requirement for the solar farm in this location and the lack of additional sites;
  - Swift Grid Connection – anticipated 2027-2030 connection;
  - Economic and Social benefits, including employment and support for the economy;
  - Wider environmental benefits including BNG; and
  - The temporary and reversible nature of the proposal.

2.21 Furthermore the NPPG, on renewable and low carbon energy, states that "*there are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and critically, the potential impacts on the local environment, including from cumulative impacts*" (Paragraph: 005 Reference ID: 5-005-20150618).

Other Material Considerations

2.22 In June 2019 the Government raised the UK's ambition on tackling climate change by legislating for a net-zero greenhouse gas emissions target for the whole economy by 2050. In October 2021 the UK government announced a commitment to decarbonise the UK's electricity system by 2035 (now 2030), a full 15 years earlier than the nationwide 2050 legal commitment – as further detailed in Section 5 of this report.

2.23 Decarbonising the power sector is integral to achieving this goal and requires major investment in proven technologies, such as energy storage, which are supported by planning policy at a local and national level. Further information is set out in Section 5 of this report.

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

2.25 Paragraph 5 of the NPPF confirms this, stating *"National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications".* In addition, paragraph 1.2.1 in NPS EN-1 states that *"In England this NPS* [NPS EN-1] *is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)".*

2.26 The following Revised NPSs, adopted in January 2024, are relevant:

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

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

- National Infrastructure Commission – Net Zero: Opportunities for the Power Section (2020);
- National Infrastructure Commission – Net Zero: Commission Recommendations and the Net Zero Target (2020);
- International Renewable Energy Agency – Battery Storage for Renewables: Market Status and Technology Outlook (2015);
- Net Zero Strategy: Build Back Greener (2021); and
- Bexley Climate Change Statement and Action Plan 2022-2026 (2023).

3.0 AIMS AND PURPOSES OF GREEN BELT POLICY

3.1 This section considers the effect of the Proposed Development on the purposes of the Green Belt. This should be read in conjunction with the Landscape, Townscape and Visual Appraisal (LTVIA) prepared by RHLA Studio, submitted in support of this application.

Assessment of the Grey Belt and Inappropriate Development

3.2 Paragraph 154 of the NPPF states that development in the Green Belt is 'inappropriate' unless it is a type of development listed as an exception. The Proposed Development is not one of the exceptions listed in Paragraph 154 of the NPPF, and is therefore could be considered as 'inappropriate development', which is harmful to the Green Belt and requires 'very special circumstances' to be approved.

3.3 However, as mentioned previously, Paragraph 155 of the NPPF states that the development of homes, commercial and other development in the Green Belt should not be considered 'inappropriate' in the following instances:

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.

3.4 The Grey Belt is defined in the NPFF as: "…*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. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development"; land designated as Green Belt, 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*". Footnote 7 includes: habitats sites (and those sites listed in paragraph 194 being SPAs, SACs, Ramsar Sites and sites identified for their compensatory measures) and/or designated as Sites of Special Scientific Interest.

Criteria a of Framework Paragraph 155

3.5 The first test in Paragraph 155 of the NPPF is to determine whether the development of the Site would utilise Grey Belt land, being either previously developed land and/or any other land that does not strongly contribute to any of the Purposes (a), (b) or (d) of the Green Belt in Framework Paragraph 143 of the NPPF. The NPPG provides Assessment Tables at Paragraph: 005 Reference ID: 64-005-20250225 to determine whether the contribution to the purposes are 'strong', 'moderate' or 'weak'.

3.6 The Grey Belt definition also excludes land where the application of policies relating to areas or assets (other than the Green Belt) would provide strong reason for refusing or restricting development.

3.7 The second test within Criterion a is to determine whether development of the Site would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the Plan.

Previously developed land

3.8 With regards to 'previously developed land', the Site comprises undeveloped greenfield land within the Green Belt, and therefore is not 'previously developed land'.

Purpose a – 'to check unrestricted sprawl of large built-up areas'

3.9 Bexley borough is identified as part of Greater London, being an 'Outer London Borough' in the London Plan (2021) Annex 2. The Site forms part of an expanse of Green Belt preventing Greater London from merging with urban centres to the south.

3.10 The NPPG is clear at Paragraph: 005 (Reference ID: 64-006-20250225) that the purpose relates to the sprawl of large built up areas, and villages should not be considered. It goes on to state that an area would contribute 'strongly' to Purpose (a) where it is free of existing development, lacks physical feature/s in reasonable proximity that could restrict and contain development, is adjacent or near a large built up area and, if developed, would result in an incongruous pattern of development (e.g. 'finger development'). Consideration has been given to the relevant NPPG assessment table for Purpose (a), included at Appendix 1.

3.11 While the Site itself is currently free from development, it adjoins agri-industrial development (i.e. the polytunnels to the south) and is in proximity to scattered residential development located in the Green Belt, the A223 (N Cray Road) and B2173 Maidstone Road.

3.12 The Site is located near the large built-up area of the outer London Borough of Bexley (approximately 200m from Footscray and Ruxley, and 1.8km from Sidcup), however, this area is physically contained by the road networks and established woodlands which would restrict sprawl. Furthermore, the Site is visually discrete and visually separated from the outer London Borough by the intervening topography which is gently undulating with the Main Site (i.e. the ESS compound) being within low-lying ground. The Site is therefore considered to be physically separated and visually enclosed such that new development of the Site would not result in an incongruous pattern of development.

3.13 The Site is well located away from other significant settlements and urban areas, including Swanley which is identified as a District Centre in the Sevenoaks Local Plan, and Dartford in Kent. The closest point from Swanley to the Site is over 1.5km away and the Site is visually separated from this large built up area by intervening topography and vegetation, undeveloped land and the A20 and B2173. The Site is located over 4 km from Dartford at the closest point providing sufficient physical separation. As such, the Site would not contribute to the loss of the gap between the outer borough area of Greater London and large urban areas to the south.

3.14 Furthermore, the character of the surrounding landscape is already influenced by urbanising influences which weaken the Site's contribution to Purpose (a) of the Green Belt, including the transition between urban and rural land uses at the edge of London, which includes large business and industrial parks and to a lesser extent the nearby Hurst Grid Substation, and. As such, if the Site were to be redeveloped to a temporary energy storage station as currently proposed, it would not result in a situation whereby neighbouring urban areas are more likely to merge nor would the degree of separation be eroded to any significant degree. There would not be a material reduction in the physical or perceived distance.

3.15 Furthermore, the Proposed Development would comprise a specialist energy use that has a direct relationship with the nearby Hurst Grid Substation, and benefits from proximity from this point of connection into the electricity grid. Therefore, the Proposed Development would not encourage the sprawl of any existing built up areas, or attract additional development to be located alongside it.

3.16 The Site is not allocated on the Local Plan map and there is a Primary Residential Area approximately 350m to the west, and Local Significant Industrial Land (LSIL) and Strategic Industrial Land (SIL) approximately 600m to the west. While there is an approved planning application (Ref.

17/02770/FUL) for 6 new dwellings adjoining the Site, there is currently no evidence of significance pressures for further development.

3.17 In terms of 'unrestricted sprawl', 'urban sprawl' refers to the spreading of a town or city and its suburbs over previously undeveloped land, and implies uncontrolled, unplanned or unrestricted sprawling of an urban environment. The Proposed Development would provide a temporary sustainable use and as it is non-occupied land in a location of poor amenity for residential development it would not stimulate other forms of development that would contribute to the sprawl of nearby urban centres.

3.18 The Proposed Development is also considered to be minimally intrusive, given the single storey design and the retention of field boundaries and new planting which provide defensible and durable features which negate any perceived urban sprawl. The habitat area set-aside (as shown on Landscape Masterplan) would comprise a 10 m wide tree planting buffer providing further screening between the ESS compound and North Cray Road and residential properties to the north.

3.19 Furthermore, once decommissioned the land would be returned to its current use.

3.20 Given the above, it is considered that the Site makes a **weak contribution to Purpose 'a'** and therefore does not contribute strongly to preventing unrestricted sprawl of large built up urban areas. As such, the Proposed Development is not considered to conflict with this purpose of the Green Belt.

Purpose b – 'to prevent neighbouring towns from merging into one another'

3.21 The NPPG is clear at Paragraph: 005 (Reference ID: 64-006-20250225) that this purpose relates to the merging of town, not villages. It goes on to state that an area would contribute 'strongly' to Purpose (b) where it is free of existing development and includes the following features: forming a substantial part of a gap between towns and the development of which would be likely to result in the loss of visual separation between towns. Consideration has been given to the relevant NPPG assessment table for Purpose (b), included at Appendix 1.

3.22 As mentioned above, Bexley Borough is identified as an 'Outer London Borough' in the London Plan, within which the nearby Sidcup and Swanley are identified as 'District Centres', and therefore are not considered to be 'towns'. There are smaller areas of residential, commercial and industrial development within the vicinity of the Site, including North Cray (approximately 800m to the north) and Foots Cray and Ruxley (approximately 800m to the west and south). These are associated with the urban areas of Bexley and Bromley and are not considered to be 'towns'. Therefore, while the

ESS Site is free from development, it does not form part of a physical gap or visual separation between towns.

3.23 Given the above, the Site is considered to have a **weak contribution to Purpose 'b'** of the Green Belt and the Proposed Development is not considered to conflict with the purpose of the Green Belt to prevent neighbouring towns from merging into one another.

Purpose d – 'to preserve the setting and special character of historic towns'

3.24 Paragraph: 005 (Reference ID: 64-006-20250225) of the NPPG states that Purpose (d) relates to historic towns, not villages, and where there are no historic towns in the plan area, it may not be necessary to provide detailed assessment against this purpose. Areas that contribute 'strongly' to this Purpose are likely to be free of existing development and form part of the setting and make considerable contribution to the special character of the historic town, including significant visual importance. Consideration has been given to the relevant NPPG assessment table for Purpose (d), included at Appendix 1.

3.25 The High Beeches Conservation Area is located approx. 300 m to the west of the Site, separated by the A223 North Cray Road. The Conservation Area is associated with the built-up urban area of Foots Cray and Ruxley within LBB, and does not constitute a 'historic town' for the purposes of Paragraph 143(d).

3.26 Notwithstanding, a heritage assessment has been submitted with the application, which assesses the impact on all relevant heritage assets and any necessary landscape mitigation. It does not identify the High Beeches Conservation Area as an asset that would be affected by the Proposed Development in terms of the asset itself nor its setting.

3.27 As such, the Site would not make any contribution to preserving the setting and special character of historic towns and the Proposed Development will not harm the preservation of the setting and special character of historic towns.

3.28 Given the above, the Site is considered to have a **no contribution to Purpose 'd'** of the Green Belt and the Proposed Development is not considered to conflict with the purpose of the Green Belt to preserve the setting and special character of historic towns.

Footnote 7 Constraints

3.29 The Site is not identified as an area or asset of which the application of policies in footnote 7 of the NPPF (other than Green Belt) would provide strong reason for refusing or restricting the Proposed Development. Furthermore, there are no statutory or non-statutory environmental, heritage or

landscape designations (other than the Green Belt) within the Site and the Site is located entirely within Flood Zone 1, as detailed within the Planning, Design and Access Statement submitted with the planning application.

3.30 Given the above, it is considered that the Site is considered to be Grey Belt. However, for the Proposed Development to be considered not inappropriate development, it must satisfy the second test in Criteria a and remaining Criteria b, c and d of NPFF Paragraph 155.

Impact on the purpose of the remaining Green Belt in the Plan area

3.31 The second test within Criteria a is to consider the impact on the purpose of the remaining Green Belt in the Plan area.

3.32 The NPPG Paragraph 008 and 009 (Reference ID: 64-008-20250225 and Reference ID: 64-009-20250225) state that proposals on Grey Belt land that is not identified in existing plans or Green Belt assessments, should consider, in addition to Criteria A, whether development of the Site would fundamentally undermine the purpose of the remaining Green Belt across the Plan area.

3.33 As such, an assessment against Purpose (c) and (e) in Framework Paragraph 143 of the NPPF is required which is provided in below.

To assist in safeguarding the countryside from encroachment

3.34 The Main Site is outside of the settlement boundaries and Sustainable Development Locations in the Bexley Local Plan and is within the countryside. As mentioned previously, while the Site is located near the large built-up area outer London Borough of Bexley, these areas are physically contained from sprawl and the Site is visually separated from these areas and surrounding development by the intervening topography. As a result, the Proposed Development will not itself be a form of significant encroachment nor will it encourage any further encroachment into the countryside.

3.35 The LTVIA submitted with the planning application notes that there would be a degree of encroachment into the countryside due to the spatial reduction in openness within the Main Site due to the introduction of new equipment on greenfield land, however, such impact would be very localised and small in relation to the wider extent of the Green Belt. Further to this, the encroachment would be reduced by the physical distance between the proposed ESS and permeability of the sub-station infrastructure, and the introduction of new equipment would occur only to the southern part of the Main Site. Given this, the introduction of new equipment would be

located next to the existing polytunnel development in the south such that any changes would not affect land that is surrounded by inherent countryside.

3.36 The perception of encroachment would also be reduced with the establishment of the proposed planting and that views would remain across the Main Site due to the relatively low height of the equipment.

3.37 Following the cessation of the Proposed Development, the Main Site would be restored to its existing agricultural use, and therefore any impact on the surrounding Green Belt would not be permanent and is reversible.

3.38 The Main Site is within the countryside, however, the impact to Purpose (c) would be negligible adverse given the localised landscape, townscape and visual effects, the consolidated ESS layout, the temporary nature of the Proposed Development and the beneficial changes from new landscaping. Thus, the purpose of safeguarding the countryside from encroachment would not be undermined.

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

3.39 The Proposed Development would comprise a temporary use of a greenfield land and therefore would not result in the long-term loss of the land. Following the decommissioning of the development at the end of the 40-year period, the land will be restored to its former condition.

3.40 Moreover, renewable energy developments (including energy storage systems) are not an uncommon sight in countryside locations, including Green Belt, owing to the established and urgent national need to decarbonise the electricity grid.

3.41 It should also be noted the Hurst Grid substation, to which the Proposed Development would connect, is located 1.45 km north-east of the Site in the Green Belt. The Proposed Development requires a location in proximity to the point of connection and it must have the capacity to accommodate an ESS of up to 200 MW. The Hurst Grid substation is one of a limited number of existing substations suitable to accommodate the development. The Site was selected as it is located in proximity to the substation and would therefore result in the fewest technical and environmental impacts. As demonstrated in the Site Selection Report (SSR) submitted with the planning application, there were no additional sites of sufficient size in urban areas / on brownfield land or agricultural land of lower quality and within viable distance (being 3 km) of the existing Hurst Grid substation.

3.42 It should be noted that the SSR has gone above and beyond the LBB Pre-Application Response (Reference 25/00139/PREAPM, dated 11 March 2025) with regards to an appropriate search area which identified 2 km as being appropriate: "*With regards to (e), it will be crucial that a planning application is supported with a robust Alternative Site Assessment (ASA). It is acknowledged that there are certain constraints with regards to the location of an ESS development, such as distance from a Point of Connection (POC). An appropriate search area is suggested as 2km from the POC. Available or potential derelict land should be included, including former industrial land etc*".

3.43 The importance of proximity to the grid connection point is noted in Appeal decision (Ref APP/Q4245/W/24/ 3358422) for an ESS within the Grey Belt of Greater Manchester, the Inspector stated: *"I am also cognizant that BESS facilities require a location where grid connection is feasible. Although there may be other sites that would constitute derelict or urban land, the evidence suggests that it would be impracticable to locate the development in areas that contain characteristics of dereliction that would be capable of connection to the existing Sale Bulk Supply Point (Sale BSP)"* (Paragraph 19). Further to this, Appeal decision (Ref APP/V4630/W/24/3347424) for another ESS in the Grey Belt in Walsall states: "*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*".

3.44 Given the above, the Proposed Development would not conflict with the purpose of assisting in the recycling of derelict and urban land.

Conclusion

3.45 Given the above, the Site does not strongly contribute to Purposes (a), (b) or (d) of the Green Belt (See Table 3.1) and is therefore considered to be Grey Belt as per the definition within the NPPF. The removal of the Site from the Green Belt would not fundamentally undermine the five purposes (taken together) of the remaining Green Belt across the Plan area. As such, the Proposed Development would satisfy Criteria a in Paragraph 155 of the NPPF in that it would not .

3.46 Footnote 55 of the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm of the Green Belt, including its openness. This is reiterated in Paragraph 014 (Reference ID: 64-014-20250225) of the NPPG which states that where development (of any kind, including on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or

to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by "very special circumstances".

3.47 Notwithstanding the NPPG, should LB Bexley consider the Site to be within the Green Belt, rather than 'Grey Belt', the Applicant has provided an assessment on the openness (Section 4) and harm to the Green Belt (Section 5), and set out a case for very special circumstances (Section 6).

Table 3.1 Site-specific performance against Purposes (a), (b) and (d) of the Green Belt

	Purpose A: Checking unrestricted sprawl	Purpose B: Preventing the merging of towns	Purpose D: Preserving the setting and special character of historic towns
The Site	Weak	Weak	No Contribution

Criteria b of Framework paragraph 155

3.48 In terms of Criterion b, there is a significant and quantifiable need for the deployment of energy storage and the role it plays in supporting renewable energy generation, which is being driven by government at local and national level in the UK.

3.49 NPPF Paragraph 168 is clear that applicants are not required to demonstrate the overall need for renewable and low carbon energy developments: "*When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future*".

3.50 Notwithstanding, Section 6 of this Report sets out the significant and quantifiable need for the Proposed Development.

3.51 A similar stance is taken in Appeal decision (Ref APP/Q4245/W/24/ 3358422) wherein the Inspector cited the demonstrable need for ESS development: *"There is unquestionably a demonstrable need for the development having regard to various Government pronouncements, some of which are explored above and which are not disputed in this case, that seek to substantially increase battery storage in order to cater for renewable energy generation. Unquestionably, paragraph 155(b) criterion is met*"

3.52 Further to this, the LBB Pre-Application Response (Reference 25/00139/PREAPM, dated 11 March 2025) acknowledges the demonstrable need for energy storage in the transition to Net Zero and the weighting attributed to an accepted grid connection offer in being able to achieve these targets:

"*Given the context provided by NPS EN-1 and the Framework, it is concluded that an ESS project more than likely represents much needed associated infrastructure. However, the applicant should ultimately demonstrate this as part of their submission*.

In addition to this, it is acknowledged that one of the constraints to the early development of renewable and low carbon energy and associated infrastructure is the ability to access the local grid. It is understood that in some places, notwithstanding the appetite to develop projects, grid connections are not available for several years. Thus, given the imperative of mitigation climate change and achieving net zero, it is likely the project can make an early contribution to the clean power pathway required to achieve net zero. Whilst the LPA accepts it will be likely demonstrable that there is an unmet need for this kind of development, the onus is on the applicant, and they should provide quantifiable evidence of an unmet need for this type of development".

3.53 Footnote 56 in Criteria b does not apply to the Proposed Development as it relates to housing development.

3.54 It is considered that the Proposed Development satisfies the requirement of Criteria b of Paragraph 155.

Criteria c of Framework paragraph 155

3.55 Criterion C requires that the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF.

3.56 Paragraph 110 indicates that significant development should be focussed on locations that are or can be made sustainable, through limiting the need to travel. Paragraph 110 mainly relates to development that would generate significant levels of vehicles movements, namely by private car. This paragraph goes on the say that opportunities to maximise transport solutions will vary between urban and rural areas, and this should be taken in to account in both plan-making and decision-making. Paragraph 115 seeks to ensure amongst other things, that sustainable transport modes are prioritised taking account of the type of development and its location, safe access can be achieved and any significant impacts on the capacity of the highway network or highway safety can be acceptably mitigated.

3.57 Further to the above, the NPPG Paragraph 011 (Reference ID: 64-011-20250225) clarifies that whether locations are sustainable should be determined in light of local context and site or development-specific considerations.

3.58 During the 12-month construction period, two Heavy Goods Vehicles (HGVs) will typically access the Site per day, comprising one rigid bodied HGV (up to 10 m in length) and one articulated HGV, and up to 50 construction staff / contractors at peak times travelling to the Site each day. During operation, there would be maintenance visits by LGVs (generally two per month) and estimated one HGV trip may occur per annum, and these vehicle movements are not considered to be significant nor would they have an unacceptable effect on highway capacity or safety. The submitted CTMP demonstrates that the proposed construction routing and site access would be able to accommodate safe construction and operational vehicle movements, subject to some localised widening.

3.59 Further to this, given the nature of the Proposed Development, the use of sustainable transport modes during construction and operation would not be practicable. Notwithstanding the CTMP submitted with this application states that construction staff will be encouraged to a mini bus or car sharing where practicable.

3.60 The LBB Pre-Application Response (Reference 25/00139/PREAPM, dated 11 March 2025) acknowledges the ease of access afforded to the Site with regards to Criteria c: *"Whilst the application site is not within a Sustainable Development Location (SDL), access would be afforded with relative ease from North Cray Road. It is considered likely that the applicant will be able to demonstrate this requirement can be met*."

3.61 Footnote 57 in Criterion C does not apply to the Proposed Development as it relates to traveller sites.

3.62 In terms NPPG Paragraph 011 (Reference ID: 64-011-20250225), the Proposed Development is considered to be in a sustainable location owing to its development-specific considerations to be within maximum 3 km from the point of connection into the electricity grid, thereby minimising connection and transmission costs. As explained in detailed in Section 6 of the PDAS and in SSR submitted with this application, the site-specific qualities also offer a sustainable location for the Proposed Development given the lack of environmental constraints, separation from residential areas and settlements, ease of access, existing visual screening and suitable topography.

3.63 Given the above, it is considered that the Proposed Development would satisfy Criteria c of NPPF Paragraph 155.

Criteria d of Framework paragraph 155

3.64 In term of Criteria d, the 'Golden Rules' set out in Paragraph 156 relate to major development involving the provision of housing, and therefore is not relevant to the Proposed Development. This stance is upheld in the LBB Pre-Application Response (Reference 25/00139/PREAPM, dated 11 March 2025): *"(d) Golden Rules: Not applicable, as they only relate to housing*".

3.65 As such, no further consideration is given to Criteria d.

Conclusion

3.66 Given the Site is considered to be Grey Belt and the Proposed Development would satisfy the relevant Criteria within Paragraph 155 of the NPPF, it is considered to be 'not inappropriate' development in the Green Belt. As such, very special circumstances are not required to enable the granting of planning permission for the Proposed Development.

4.0 IMPACT ON THE SPATIAL AND VISUAL OPENNESS AND CHARACTER OF THE GREEN BELT

4.1 This Section should be read in conjunction with the LTVIA and accompanying photomontages prepared by RHLA Studio, submitted in support of this application.

4.2 Paragraph 153 of the NPPF states that when considering any planning application, LPAs should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Footnote 55 of the NPPF clarifies that this is other than in the case of development on previously developed land or Grey Belt land, where development is not 'inappropriate'. This is explained further in NPPG Paragraph 014 (Reference ID: 64-014-20250225), which states: "*that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness*."

4.3 As stated previously in this Report, the Site is considered to be Grey Belt and the Proposed Development is 'not inappropriate' development. Should LB Bexley consider that the Site is not Grey Belt, and thereby inappropriate development in the Green Belt, the Applicant has set out an assessment against the aspects of Spatial and Visual Openness, any other harm to the Green Belt and provided a case for 'very special circumstances' of development within the Green Belt, which are set out in Sections 4, 5 and 6 of this Report.

4.4 The NPPG for the 'Green Belt' sets out the matters which may need to be taken into account when assessing the impact of a proposal on the 'openness' of the Green Belt at Paragraph 001 (Ref ID:64-001-20190722), which include:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

4.5 The concept of 'openness' relates to the absence of buildings and therefore any 'inappropriate' built development would by virtue have an impact on the Green Belt.

4.6 As such, it is accepted that the ESS Compound Area of the Proposed Development would result in a reduction in openness by virtue of replacing a currently undeveloped field / greenfield land with built development. Further, the LTVIA submitted with this planning application accepts that the

massing of the equipment in comparison to the currently open and undeveloped field would result in a spatial reduction to openness within the Main Site, and therefore would cause some harm to the Green Belt, albeit would have a negligible adverse effect in terms of the perception of encroachment into the countryside as explained earlier.

4.7 However, the LTVIA considers that this spatial impact would be very localised and small in relation to the wider geographic extent of the Green Belt given the Proposed ESS would be consolidated and limited to the southern part of the Main Site, the physical distance between the ESS equipment and the permeability of the sub-station, and the temporary duration of the development. The change would be located within an area of land that is surrounded by varied land uses and is not surrounded by the inherent countryside.

4.8 Through the design evolution process, careful consideration has been given to ensure the impact on spatial openness is kept to the very minimum and therefore its impact on the wider landscape is mitigated in line with the design principles to minimise landscape and visual impacts. The design of the proposals has incorporated the following details:

- ESS units are proposed to be single-stacked in order to keep the profile of the Proposed Development low;
- the layout of the ESS is consolidated as far as practicable to maximise undeveloped land within the Site and is positioned close to existing structures of similar height to provide a logical extension to the polytunnels in the south;
- the ESS is surrounded on all sides by native planting including native hedgerows and hedgerow trees, species-rich grassland, including a new linear woodland feature on the northern boundary of the ESS, new native trees in the south-east and a mixed scrub area with small urban trees to the north-west of the ESS;
- retaining the traditional field pattern and existing field boundaries, as identified in the published landscape character assessments;
- the proposals are fully reversible. At the end of the planning permission (40 years) the Proposed Development will be removed, leaving no concrete foundations, enabling the land to be reverted to its original state without any land-take.

4.9 Further to this, a condition requiring decommissioning at the end of its period and restoration of the Main Site to its previous use. In line with the NPPG, the duration of development is a factor that can be considered when assessing the potential impact of a development on the openness of the

Green Belt. Accordingly, the temporary nature of the Proposed Development reduces any potential limited impact on the permanence of the Green Belt.

4.10 A stance regarding the impact of spatial and visual openness is not addressed in LBB pre-application advice letter (Ref. 25/00139/PREAPM, dated 11 March 2025) for the Proposed Development, which states: "*the LPA indicates that the application site may be capable of being classified as grey belt land. The applicant is advised to robustly justify this by addressing the tables provided in the updated NPPG…The NPPG clarifies that if a development is deemed not inappropriate on grey belt land, then substantial weight is not given to harm to the Green Belt, including its openness. In this case, the proposal would not require justification through VSCs*."

4.11 As such, the harm caused to the spatial openness is considered to be **limited** harm**.**

4.12 The Proposed Development would be visible from various receptors, as demonstrated in the LTVIA. In terms of visual openness, the Main Site of the development has a semi-rural character which is eroded to a degree by urbanising influences of existing commercial / industrial development (i.e. polytunnels to the south). It would also be located in the southern part of the Site close to existing agricultural development (i.e. polytunnels) in the south. Further to this, equipment has been designed to limit the height of equipment as far as practicable (i.e. single storey) in contrast to potential taller equipment. The Site has a gently undulating and enclosed character and the ESS infrastructure has been positioned in a low-lying part of the Site which is well screened by existing vegetation, and which would be further bolstered by the landscaping proposals, so as to minimise the impact on visual openness of the Green Belt. Further to this, there has been careful choice of rendering for the ESS containers and palisade fencing (i.e. dark green tone) to reflect the surrounding landscape.

4.13 While the substation would be the most visually prominent aspect of the Proposed Development, its appearance is relatively permeable. The substation is positioned to be in-line with existing trees to soften any views to it and help retain visual openness across the Site. These aspects combined limit impacts to visual openness.

4.14 Turning to the degree of activity generated by the Proposed Development, the Site has historically been used for agricultural purposes, and the Site's current character is considered to be noisy and disturbed due to the nearby roads, residential land uses and agricultural activity (i.e. horticultural, horsiculture). As demonstrated in the Noise Assessment submitted as part of this application, it is considered that the Proposed Development will not worsen this character in terms of noise generating activity. Furthermore, due to landscaping and biodiversity improvements it is

considered it will improve the Site towards what is intended to be the typical character of the Green Belt.

4.15 During construction there would be temporary visual impacts at various receptors from the construction activity associated with the ESS Compound Area, site access and underground cable, which would last approximately 12 months. Two receptors, being a public footpath and a Manor Farm cottage residential property, would experience 'major adverse' effects during construction due to their proximity to the Main Site and elevated position within the landscape, albeit these would be temporary.

4.16 Traffic generated by the movement of construction vehicles would be minimal with 2 HGVs arriving per day (equivalent to 10 HGVs per week), and 50 construction staff arriving / leaving by car or mini bus. Once the Proposed Development becomes operation, the frequency of vehicle movements would be much lower than in the construction phase and the vehicle types would be limited to light goods vehicles. Operational vehicle movements will be similar, if not lower, the current use of the site as an operational farm (one to two vehicle movements are expect a month).

4.17 The limited activity associated with the operational stage of the development assists in further limiting its visual impact. The weighting of the minimal operational activity is acknowledged by the LBB Pre-Application Response (Reference 25/00139/PREAPM, dated 11 March 2025).

4.18 The LTVIA also concludes that due to the very localised spatial and visual change of the Proposed Development to this land alongside the compensatory improvements and reversibility of the Proposed Development, it would have negligible adverse impact on the Green Belt.

4.19 As such, it is acknowledged that the Proposed Development would result in some visual impact and perception of loss of openness however the extent of impact would be a small degree and of **limited** harm, as indicated in the LTVIA submitted as part of this planning application.

Conclusion

4.20 The above section demonstrates that the Proposed Development would have a **limited** harm upon the spatial openness and **limited** harm on the visual openness of the Green Belt. Furthermore, the visual openness and semi-rural character of the wider locality has largely been eroded by the presence of existing built development and road networks, it follows that any impacts would be limited by the minimal activity during operation

4.21 It is therefore concluded that the overall impacts upon the openness of the Green Belt would be **limited**.

5.0 HARM AND ANY OTHER HARM

5.1 Should LBB not agree with the Applicant's position that the Site is within the Grey Belt and that the Proposed Development is not 'inappropriate development', an assessment of harm to the Green Belt and any other harm is set out below.

5.2 Should the Site be considered Green Belt land, the Proposed Development would, by virtue of NPPF Paragraph 154, be 'inappropriate development' within the Green Belt. As such, the Proposed Development would give rise to harm by virtue of being inappropriate development in the Green Belt, which is considered to be **substantial harm**. In addition, it would also cause a degree of **limited harm** to the spatial openness of the Green Belt and **limited harm** to the visual openness of the Green Belt.

5.3 Notwithstanding the level of harm by virtue of the location within the Green Belt, **significant weight** should be awarded owing to the sensitive design, layout, siting and ecological / landscape enhancements, the temporary and reversible nature of the development, the minimal activity generated during operation.

5.4 Any higher tier adverse landscape effects during construction and operation are highly localised and limited to the site-level, due to the change in character of the Site from undeveloped to an EES, and to the host Local Townscape Character Area within which the Main Site sits. However, the latter effects would only be perceived at a very local scale and from few publicly accessible locations due to the small and consolidated layout of the Proposed ESS. There would also be beneficial changes associated with landscape and ecological enhancements in the Illustrative Landscape Masterplan. Furthermore, construction effects would be temporary. In terms of visual effects, the LTVIA concludes that there would be some adverse visual effects on receptors however all would be 'not significant' and the higher tier effects would be from close range views from footpath FP141 and residents in a more elevated position relative to the ESS. The higher tiers of adverse effects occur as a result of construction activity and therefore would be temporary whilst any higher tier effects during operation are mitigated by the consolidated layout and minimal massing of the ESS, set against the back-drop of the polytunnels to the south.The harm in landscape and visual terms is considered to be **limited**.

5.5 In terms of effects to designated and non-designated heritage assets, the Cultural heritage desk-based study concludes that the Proposed Development would not alter the setting of the Grade II Listed Cray Hall and Locally Listed Manor Farmhouse in a way which would negatively affect their significance and therefore no harm is found. Further to this, there would be no physical effects on

heritage assets as there are no designated assets within the Site. There is potential for unknown buried archaeological remains that may be within the Site to be affected by groundworks, however, any remains are expected to have limited significance, and an appropriate programme of investigation and mitigation measures would be agreed with LBB. As such harm in cultural heritage terms is considered to be **limited.**

6.0 VERY SPECIAL CIRCUMSTANCES

6.1 As set out above, the Proposed Development comprises a number of energy storage containers, with a very limited number of ancillary buildings and above ground infrastructure.

6.2 Should the Site not be considered to be 'Grey Belt' land, and not 'inappropriate development' under NPPF Paragraph 155 by LBB, the Applicant has set out a case for Very Special Circumstances.

6.3 Paragraph 153 of the NPPF states that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 requires that substantial weight be given to any harm to the Green Belt and sets out that 'very special circumstances' will not exist unless the potential harm to the Green Belt by inappropriate development (i.e. those not listed as an exception in Para 154), is clearly outweighed by other considerations.

6.4 The Proposed Development is not one of the exceptions listed in Paragraph 154 of the NPPF, and is therefore if it is deemed not to be within the Grey Belt and satisfy NPPF Paragraph 155, it would constitute 'inappropriate development'. Inappropriate development is deemed harmful to the Green Belt and requires 'very special circumstances' to be approved.

6.5 These very special circumstances for the Proposed Development are set out in detail below:

- The need for renewable energy generation and its role in meeting the challenge of climate change;
- The requirement for the ESS in this location and the lack of alternative sites;
- Swift grid connection – anticipated 2027-2030 connection;
- Support for the rural economy;
- Wider environmental benefits including planned biodiversity net gain ('BNG');
- The temporary and reversible nature of the proposal; and
- Other benefits of the proposals include diversifying the National Grid away from fossil fuels, increasing energy security and lowering electricity costs.

6.6 Whilst there are no ESS schemes within the LBB area it is noteworthy that other ESS schemes within the Green Belt around the country have been consented for their very special circumstances, and their approvals demonstrate a growing precedent both locally and nationally for the acceptability of urgently needed storage developments within the Green Belt. The very special circumstances

have comprised a mix of: the need for energy storage and its role in meeting the challenges of climate change, the requirement for ESS in that location and energy security and balancing services, and with some approvals also citing the wider environmental benefits and socio-economic benefits, such as reducing energy costs and employment.

The need for energy storage and its role in meeting the challenge of climate change

6.7 There is a significant and quantifiable need for the deployment of energy storage and the role it plays in supporting renewable energy generation, which is being driven by government at local and national level in the UK.

6.8 In October 2021 the UK government announced[2] a commitment to decarbonise the UK's electricity system by 2035, a full 15 years earlier than the nationwide 2050 legal commitment, identifying that: *"we need to reduce our emissions and meet increased demand whilst ensuring the system remains reliable and affordable".* Since Labour has come into power in July 2024, they have brought forward this target to 2030.

6.9 The Government also recently published the 'Net Zero Strategy, Build Back Greener'[3], which sets out its vision to end our contribution to climate change, and reverse the decline of our natural environment, leading the World to a greener, more sustainable future. It sets out that we need to act urgently and reduce emissions globally to limit further global warming. The sooner we act on climate change the lower the costs will be. Globally, the costs of failing to get climate change under control would far exceed the costs of bringing greenhouse gas emissions down to net zero. Delaying action would only serve to put future generations at risk of crossing critical thresholds resulting in severe and irreversible changes to the planet, the environment, and human society. On the other hand, early and ambitious action would help protect lives and livelihoods, while maximising the benefits for people, society, the environment, and the economy.

6.10 This Strategy commits to take action so that by 2035 (now 2030), all electricity will come from low carbon sources, subject to security of supply, bringing forward the Government's commitment to a fully decarbonised power system by 15 years, and it explicitly seeks to accelerate deployment of low-cost renewable generation, including wind and solar. It also notes that our exposure to volatile

[2] https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035
[3] https://www.gov.uk/government/publications/net-zero-strategy

gas prices shows the importance of our plan for a strong home-grown renewable power sector to strengthen our energy security into the future.

6.11 Meeting these targets requires major investment in proven technologies. The provision of low carbon energy is central to the economic, social and environmental dimensions of sustainable development set out in the National Planning Policy Framework (NPPF). There is strong national policy support, from the Government's Energy White Paper (EWP)[4] and National Policy Statement EN-1 (NPS EN-1)[5], for the development of additional energy storage capacity, which is essential to the storage of energy generated from renewable sources which by their nature, intermittently generate energy, taking energy from the grid at times of higher supply/lower demand and feeding it back at times of lower supply/higher demand. Additionally, NPS EN-1 advises that storage is needed to reduce the costs of electricity and increase the reliability of supply.

6.12 The Secretary of State for Energy Security and Net Zero conducted a review of the suite of NPSs for energy infrastructure in 2023, to ensure that they reflected the objectives set out in the EWP, and that the Government could continue to have a planning policy framework that could deliver the investment required to build the infrastructure needed for the transition to net zero by 2050. These revised energy NPSs were adopted in January 2024. Revised NPS EN-1[6] further emphasises the need for additional electricity storage at paragraph 3.3.25 states that *"Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated".*

6.13 Consistent with the current version, Revised NPS EN-1 emphasises at paragraph 3.3.26 that storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher.

6.14 There is an increasingly urgent requirement to assist the National Grid with balancing issues throughout the electricity transmission network brought about by various sources such as fluctuating power generation as well as surges and dips in consumption. Smooth grid operation relies on the provision of rapid reactive power services either by generation or dedicated facilities to enable frequency stabilisation. Energy storage technology provides sub-second response times, so offer a reliable solution to a number of the grid's balancing issues.

[4] https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future
[5] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1
[6] https://www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure

6.15 Balancing demand and supply in real time can be complex as the number of intermittent generators increases (renewables such as wind and solar). The need for cyclical and reactive "peaking" generation has historically been met by generation sources (typically gas powered with associated CO2 emissions) able to stop and start to some degree on demand. Due to advancements in technology, energy storage is now a viable and reliable instrument to provide a faster service supplementing the generation required to meet peak daily demand. Energy storage systems have the capacity to hold the power and release it onto the grid as and when it is required allowing for a predicted and manageable flow of electricity.

6.16 It is important to note that the proposed ESS does not emit carbon dioxide. The ESS component is a form of electricity generation as well as storing electricity it also draws electricity (charging) when levels on the network are above that of demand. When levels of electricity on the grid are below that of demand, the electricity stored in the batteries can be fed back (discharged) onto the network to meet the demand so that there is no loss of power to end users.

6.17 There is a need by the National Grid for ESS facilities to come on line to ensure the fluctuations within the grid supply are combatted by a reactive source which will enable the smooth operation of the grid.

6.18 By using ESS 'smartly' a virtual uninterruptible power supply can be provided to the local network giving a reliable and sustainable flow to any required facility such as residences, factories, hospitals, local authority buildings, commercial industries.

6.19 As we move forward and aim to meet targets to a carbon neutral economy, as the risks and effects of climate change are impacted upon everyday life, as cleaner and more sustainable methods of power generation are brought online, the need to be able to balance these different fluctuating generation methods, to control flows and hold essential power is crucial. For a power hungry, technologically advancing world, an intelligent method of control of generated power is an indispensable tool in modern day life. This tool has to provide a viable, sustainable, and low impact solution. ESS facilities are particularly important as it is a 'clean' solution to power balancing.

6.20 There is an ever increasing reliance on renewable forms of energy generation, such as wind and solar, to supply the UK's energy demands. Renewable energy sources are highly variable due to their weather dependency. As a result of the intermittent nature of renewables and the continuous requirement for National Grid (NG) to balance grid frequency (within ±1% of nominal system frequency, which is 50.00Hz) supporting energy balancing solutions need to be incorporated into the UK's energy strategy.

6.21 System frequency is a continuously changing variable that is determined and controlled by the second-by-second (real time) balance between system demand and total generation. If demand is greater than generation, the frequency falls while if generation is greater than demand, the frequency rises. If the transmission system is not maintained within the required frequency tolerance system stress can result in wide spread power supply issues and damage to network infrastructure.

6.22 Energy storage is a key part of the Government's energy strategy and provides NG with balancing services to help accommodate the increasing level of renewable energy generation. The Proposed Development has the capacity to store and supply over a combined total of 200,000 kWh of electricity per day as an enabling technology for renewable generation and a replacement for gas fired power generation in providing a rapid response to satisfy peak demand. In renewable generation terms this equates to the availability to provide electricity to over 687,822 homes every year (during operation – 2 hours).

6.23 The Government's recent 'Clean Power 2030' document (released in December 2024) forecasts how much energy storage we need to decarbonise the grid by 2030 – being 23-27 Gigawatts of battery capacity and 4-6 GW of long duration energy storage. Essentially energy storage is recognised in policy as essential to meeting the Government's legally binding Net Zero target, so considerable weight is being attached to ESS proposals provided they can be mitigated sufficiently.

6.24 Further to this, the energy storage was redefined by the Government under the Energy Security Bill (2023) and subsequent Energy Act 2023 to form a distinct subset of generation, it defined the storage as energy that was converted from electricity and is stored for the purpose of its future reconversion into electricity. In essence, Energy Storage under UK law is considered a low carbon energy generation.

Electricity Market Reform

6.25 Electricity Market Reform (EMR) brought about in the Energy Act 2013, was a major change to the UK's energy policy to make sure that the UK can generate enough electricity for everyone in the future through cleaner sources of generation. Coal powered facilities and aged nuclear facilities are being brought to end of life and a rise in renewable energy technologies bring online a power source that can be unpredictable in levels of generation.

6.26 The UK is generating more electricity from renewable, low carbon sources to meet climate change commitments set out by the UK Government. With all the necessary investment and progressive developments, electricity can remain affordable for UK households and businesses. It is estimated

that over the next decade, the UK will need around £100 billion of capital investment in its electricity infrastructure to accommodate projected future increases in electricity demand and to prevent electricity blackouts.

6.27 Energy storage developments are proposed in response to the requirement for the generation of 'clean' electricity in conjunction with the continuity of supply of electricity, particularly during periods of peak demand.

6.28 The UK's electricity grid has historically relied on large, centralised power plants such as coal or nuclear. However, all coal fired power stations have now ceased operation (with the last coal powered station switched off 1 October 2024) and existing nuclear power plants are reaching the end of their design lives, again with a view to long term closure.

6.29 In order to maintain the level of energy requirements and meet rising demands including long term forecasts with net zero targets, there is an obligation to meet this by means of renewable energy sources. These technologies, such as solar and wind, are intrinsically difficult to predict, which in turn makes it more difficult to balance and predict the production and flow of energy onto and off the network. However by combining technologies, it allows for a more predictable and manageable flow.

6.30 Through the Energy Act 2013 the Capacity Market (CM) mechanism was introduced to ensure security of electricity supply at the least cost to the consumer. The Proposed Development will be able to participate in the Capacity Market and a number of balancing mechanisms for the National Grid.

The Capacity Market

6.31 To deliver a supply of secure, sustainable, and affordable electricity, the UK needs not only investment in new generation projects and innovative technologies but to get the best out of existing assets on the network. The Capacity Market aims to deal with both these issues by bringing forward new investment while maximising current generation capabilities.

6.32 The Capacity Market aims to balance the difference between demand and supply and to bring forward investment in new generation projects and innovative technologies, in parallel to maximising the utilisation of the existing generation capacity. The Capacity Market operates alongside the electricity market, which is where most participants will continue to earn the majority of their revenues. The Capacity Market revenues are decided by auctions. In order to qualify for the auctions, planning permissions need to be secured in advance of sites being entered into the auctions.

Balancing the Network

6.33 National Grid has a constant supply of 'extra power' available for use when the power required by customers is not equal to the power generated and a reserve supply. The Balancing Mechanism is used to ensure that the network is in balance and reserve power is then used when the network comes under 'stress'.

6.34 When unforeseen demand is put on the network, such as when a large power station suddenly comes offline, then the National Grid control room need an alternative source of power. This is achieved from rapid responding facilities such as the Proposed Development which can supply or absorb energy from the grid as instructed.

Enhanced Frequency Response

6.35 Enhanced Frequency Response (EFR) is defined by NG as being: "*a dynamic service where the active power changes proportionately in response to changes in system frequency. This service was aimed at improving the management of the system frequency pre-fault to maintain system frequency closer to 50Hz*." EFR is borne out of the NG procurement exercise, which allows tenders to be submitted to deliver balancing services. On recognising the benefits of Energy Storage Facilities (ESFs), one procurement round solely awarded services to energy storage technologies as opposed to technologies that deliver power via diesel, gas or hydro-electrical generation.

6.36 This is supported by paragraph 3.3.27 in Revised NPS EN-1 which asserts that storage can provide various services, locally and at the national level, including: maximising the usable output from intermittent low carbon generation (e.g. solar and wind); reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the National Electricity Transmission System Operator ('NETSO') and Distribution Network Operators ('DNOs') to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.

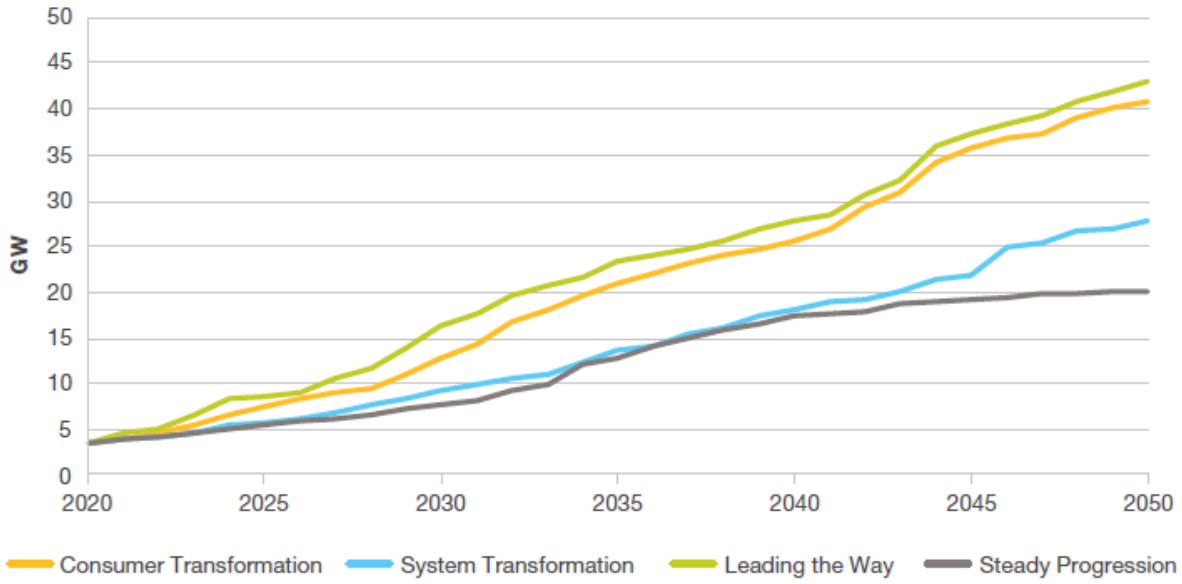
6.37 The Proposed Development is intended to provide essential services supporting the flexible operation of the National Grid. The formation of the energy storage will aid the decarbonisation of the local electricity supply by balancing electricity supply and demand as we move towards more intermittent renewable energy sources such as off-shore wind and solar power. The Proposed Development will import electricity when generation is higher, such as when it is particularly sunny or windy, and then export it back to the grid when generation is lower, or demand is higher.

6.38 This service is an important component of balancing the supply and demand on the infrastructure that serves the population and vital to a sustainable and viable network across the country as a

whole. The development will reduce fluctuations, improve stability and reduce the risk of power failures and should be regarded as essential to enable the transition to low carbon energy. Energy storage is considered to be a critical national priority (CNP) low carbon infrastructure in NPS EN-1 (para 4.2.5).

6.39 National Grid's Future Energy Scenarios (2021)[7] states that currently the energy storage capacity in the UK is 4GW and by 2050 it is anticipated that 40GW of capacity would be required in order to meet the UK's target of net zero carbon by 2050, as shown in Figure 2.1. Further to this, DESNZ 'Facilitating the deployment of large-scale and long-duration electricity storage' (2022) and 'Transitioning to a net zero energy system' (2021)[8] anticipate that at least 30GW of low carbon flexible capacity, including electricity storage, may be needed by 2030, and 60GW in 2050, to maintain energy security and cost-effectively integrate high levels of renewable energy generation. Although the scheme is modest in size, paragraph 158 of the NPPF confirms that *even "…small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions".*

Figure 2.1: Electricity Storage Capacity (Excluding V2G) (from 'Future Energy Scenarios 2021' by National Grid ESO)



6.40 The National Infrastructure Commission ('NIC') is the UK government's official and independent advisor on major infrastructure. The NIC's 2021 report 'Operability of Highly Renewable Electricity

[7] https://www.nationalgrideso.com/news/introducing-our-2021-future-energy-scenarios
[8] https://assets.publishing.service.gov.uk/media

Systems'[9] identifies the need for energy storage capacity, to support a highly renewable and flexible electricity system, asserting:

> *"Historically, coal and natural gas supplies have acted as a form of energy storage. Plants using these fuels to generate electricity have been able to manage their electricity output to meet demand requirements. But as the system decarbonises these fuels will no longer be used. Instead, the system will require storage of electricity using electrochemical storage such as batteries, mechanical storage such as pumped hydro plants or flywheels, and potentially low carbon gases such as hydrogen.*
>
> *Others, including the ESO, government, and the Climate Change Committee have also found that highly renewable electricity systems are capable of balancing supply and demand at low cost. A system such as this can only be realised if the flexibility of the electricity system is significantly increased. This can be achieved through the deployment of technologies such as electricity storage, demand side response and interconnection.*
>
> *Variable renewables rely on weather patterns such as the wind and solar irradiance. And whilst weather patterns are locally predictable, variable renewables are inherently more variable than traditional fossil fuel generation. Supply will therefore fluctuate more than previously, and so the system must be able to respond faster to these changes in generation."*

6.41 The move towards a highly renewable electricity system is already underway. The Climate Change Committee's 2021 Progress Report to Parliament identifies that between 2009 and 2019 electricity generated from renewables has increased from 9 terawatt hours (TWh) (approximately 3% of total generation) to 73 TWh (approximately 26% of total generation). The report goes on to suggest that 70% of total generation should come from renewables by 2035 (now 2030), and 80% by 2050.

6.42 Revised NPS EN-1 provides the need case for larger scale energy projects and is material to decisions on other projects such as this. It identifies at paragraph 3.3.58 '*Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy*'.

[9] https://nic.org.uk/studies-reports/operability-highly-renewable-electricity-systems/

6.43 The Government's COP26 Energy Transition Campaign[10] will help accelerate the global transition from coal to renewables, enabling the energy sector to achieve Net Zero. The UK is working through the Powering Past Coal Alliance (PPCA) and the Energy Transition Council (ETC) up to, and beyond, COP26. This will strengthen the coalition of countries, sub-national governments, and businesses phasing out unabated coal power and reduce international coal finance. The Energy Campaign will bring together countries, development banks, investors and civil society to strengthen low carbon power investment and assistance so that it is viable for every country.

6.44 A statement released on the 3 November 2021 during the COP26 conference, commits the UK and 189 other countries to rapidly scale up deployment of clean power generation and phase out coal power.

6.45 The evidence of this need, particularly for the domestic production of renewable energy, has been further demonstrated by the ongoing energy crisis. Furthermore, on 8 September 2022 the Prime Minister addressed the House of Commons about the ongoing energy crisis and announced her intention for the UK to be a net exporter of energy by 2040 through the development of renewable energy amongst other things. This re-iterates and strengthens the Government's support for domestic renewable energy generation to strengthen our energy security and economy.

6.46 A recent planning appeal decision for a proposal located within the Green Belt (APP/C3430/W/22/3292837) re-affirmed then paragraph 151 (now paragraph 153) of the National Planning Policy Framework which states that for development within the Green Belt "*very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources*".

6.47 Another recent appeal decision for a proposal located within the Green Belt (APP/W1525/W/22/3306710) has re-affirmed the need for energy storage to be located in close proximity to the grid network "*The environmental benefits of the development would not be confined to the locality of the appeal site. However, this would not diminish the overall weight to be attributed to the benefits of the proposal, particularly given the demonstrable need for battery storage in relatively close proximity to the RS [Rayleigh Substation], so as to deliver the technical 'balancing' and 'reactive power' capabilities. Taking account of the relative absence of other*

[10] https://www.gov.uk/government/publications/cop26-energy-transition-council-2022-strategic-priorities/cop26-energy-transition-council-2022-strategic-priorities

suitable sites to achieve these benefits, I give the benefits of the proposal very substantial weight". (Underline added for emphasis)

6.48 Further to this, another recent appeal decision for a proposal located within the Metropolitan Green Belt and within a Site of Interest in Nature Conservation ('SINC') (APP/N5090/W/22/3298962) in the London Borough of Barnet area has reaffirmed the importance of the proximity to the grid network and transmission stations which have a connection capacity to both export and import the requisite amount of electrical energy, noting that: "*such facilities are very limited throughout UK*". It goes on to state that: "*the BSF [Battery Storage Facility] requires a transmission station that has a connection capacity to both export and import the requisite amount of electrical energy which are rare within the UK. As such, this requirement places a locational restriction on site selection that severely limits the number of appropriate sites…The benefits identified attract very significant weight in favour of the scheme. These are of sufficient magnitude to outweigh the substantial harm found to the Green Belt. In this context, the harm to the Green Belt would be clearly outweighed by the other considerations identified and therefore the very special circumstances necessary to justify the development exist. Accordingly, the proposal would satisfy the local and national Green Belt policies."*

6.49 A recent appeal has considered the December 2024 updated NPPF which introduces the new definition of Grey Belt land and requirements into Paragraph 153 that the substantial weight afforded to any harm to the Green Belt, including harm to its openness, is applied other than in the case of development on previously developed land or Grey Belt land, where development is not 'inappropriate' development. The appeal again reaffirms the significant weight attached to the absence of alternative sites and states that: "*the development of a BESS has one key locational requirement. That is the availability of and proximity to a grid connection. Access to the local grid is the biggest constraint facing the alternative energy supply and associated infrastructure industries. Sites need to be located close to a point of connection (POC) to the grid, so as to minimise the loss of energy during transmission and the grid must have capacity to absorb the electricity discharged at times of peak demand.*"

6.50 At a local level, the 'Bexley Climate Change Statement and Action Plan 2022-2026' adopted in 2023 outlines the LB Bexley's commitments to mitigating climate change and the importance of growing the green economy locally, with opportunities such as low-carbon energy and electric vehicles. These ambitions would be significantly assisted by the production of local, renewable energy and energy storage, demonstrating a local need.

6.51 The Site is located within the administrative boundary of London Borough of Bexley, which contained 246,500households in 2021. The Proposed Development comprises the construction and operation of an ESS with a total import capacity of up to 200 Megawatts, capable of powering 647,590 homes for 2 hours. It would store and supply 200,000 kWh of electricity per day which, when taken alongside the increasing national production of renewable energy, can help to provide electricity storage equivalent to supplying over 647,590 homes for 2 hours.

6.52 The role the Proposed Development would have in providing much needed energy security and contributing towards national and local ambitions for carbon reduction is clearly significant and merits **substantial weight** in terms of the assessment of the impact of the Proposed Development on the Green Belt. This stance was recently reflected in a recent appeal decision (appeal ref. APP/N2739/W/22/3300623) which was allowed on 1st December 2022, for a larger energy storage system than the Proposed Development (320MW energy storage), and management facility including containerised batteries at Rawfield Lane, Fairburn, Selby LS25 5JB. Here, the Inspector commented that: "*In this instance I have found that the development would deliver very substantial benefits, contributing to Net Zero targets and facilitating the role out of increasing use of renewable energy resources in the country. Therefore, I find that the other considerations in this case clearly outweigh the harm that I have identified. Looking at the case as a whole, I consider that very special circumstances exist which justify the development*."

6.53 Taking all of the above into account it is of clear and national importance that energy storage capacity increases to keep up with and facilitate the rapid deployment of renewable energy. Further to this, energy storage has been redefined under the Energy Security Bill (2023) and Energy Act 2023 as a form of low carbon energy generation.

6.54 In light of the above, it is considered that there is a strong national need for grid scale ESS developments such as the Proposed Development which merits **substantial weight** to the very special circumstances for development in the Green Belt.

Energy Security

6.55 There is an increasingly clear need to ensure security of electricity supply through the development of a diverse energy system to support the increasing deployment of renewable energy, manage system stress and increased peak demands, as well as to support the increasing move towards electric vehicles.

6.56 In April 2022, the 'British Energy Security Strategy' (2022) made it clear under the heading 'Networks, storage and flexibility' that electricity storage facilities are to be encouraged:

"*encouraging all forms of flexibility with sufficient large-scale, long duration electricity storage to balance the overall system by developing appropriate policy to enable investment*".

6.57 in March 2023, the Government published its 'Powering Up Britain' suite of documentation, including the 'Energy Security Plan'. Consistent with the approach previously established in the above documents, the Government stated under the heading 'Flexibility' on page 40, that meeting the 2035 (now 2030) commitment for a decarbonised power system, subject to security of supply, will mean transitioning away from unabated gas generation, where possible, which currently provides much of our flexible capacity at present.

6.58 As a result, the Energy Security Plan states that: "*The Government will enable the acceleration of low-carbon flexible technologies and services deployment through…facilitating the deployment of electricity storage*…" (underlining is our emphasis).

6.59 It is clear from the national policy message in a number of Government publications that ESS is a key part of the energy security strategy as it provides real-time balancing of services and power at times of low or high demand to help support the intermittent nature of renewable energy generation.

6.60 It should be noted that the UK electricity network is wholly interconnected and issues in one geographic location can have far reaching implications on the network. Accordingly, ESFs offer additional capacity to deal with system stress and any variations in Grid frequency and voltage at both a local and national level.

6.61 Whilst grid balancing services can support the local and national grid, as mentioned later in this section the site selection process and available grid connection date anticipated in 2027-2030 are important factors influencing the need for the Proposed Development in this locality.

6.62 A recent Appeal decision for an ESS in the Green Belt (APP/V1505/W/23/3332888) affirms that energy storage is critical to balance out energy supply and demand (Paragraph 35), and reiterates the Council's conclusion that 'very significant weight' to be given to the contribution of ESS schemes to meeting a low carbon future in climate change by supporting renewable and low carbon energy (Paragraph 36).

6.63 In light of the above, it is considered that there is a strong national need for ESS proposals to support energy security, thereby attaching **substantial weight** to the very special circumstances for development in the Green Belt.

Additional Benefits of the Development

Clean, Efficient and Flexible Energy Source

6.64 The ESS site will provide a very flexible and rapid release of electricity to the grid without any emissions of Carbon Dioxide to the air or detrimental impact to the environment.

6.65 By importing excess energy, renewable or otherwise, from the grid and storing it, the development has the ability to capture energy that would otherwise be lost / unutilised. Energy storage systems offer opportunities to support the intermittent nature of renewables by storing the excess energy they produce and importing it back into the grid when demand requires.

6.66 During situations when primary power sources (e.g. traditional power stations) are interrupted, energy storage can bridge the gap in production, thus avoiding potential blackouts.

6.67 It should be noted that the UK electricity network is wholly interconnected and issues in one geographic location can have far reaching implications on the network. Accordingly, energy storage facilities offer additional capacity to deal with system stress and any variations in grid frequency at both a local and national level.

6.68 As recognised by NG's System Operability Framework (SOF) 5 a: "*Faster response is more effective and so less response is needed if speed can be increased*." Energy storage facilities are able to respond more rapidly than other types of balancing services, as they have no start-up delays. As such ESSs can balance the real-time requirements of the national grid more efficiently.

Embedded Distributed Power

6.69 The Proposed Development has been specifically sited to ensure a viable and sustainable connection. The infrastructure can support the development without unacceptable impact and detriment to the environment.

6.70 The Proposed Development constitutes Embedded Distributed Power (EDP) as it supplies power to the local distribution network at or near the point of use. By doing so it results in lower transmission losses which occur when power is transmitted over long distances; national level transmission losses can amount to up to 14% dependant on the region.

6.71 Local small-scale embedded distribution is less susceptible to widespread power failure because should a generating plant fail to operate, the net effect is that less generation is lost from an isolated small-scale plant failure because other similarly sized plants should remain operational. In contrast, when a large power station goes 'off line' and all of its output is lost, the effect is far greater.

6.72 However, local networks have many constraints, and with ageing infrastructure requiring continual upgrade and maintenance, it can be difficult to identify suitable connection points with necessary capacity and 'fault headroom' for embedded distributed power.

6.73 The Applicant, after in-depth consultation with the DNO, was able to assess the local distribution networks and identify a site where the network could accept embedded distributed power and where there was a benefit to the network of balancing by the inclusion of the development within the network frame.

6.74 The Application Site meets the DNO's technical requirements as there is sufficient fault level head room and capacity to accept a connection.

The requirement for the ESS in this location and lack of additional sites

6.75 Paragraph 168 of the NPPF makes clear that local planning authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy. Notwithstanding this, the need for the Proposed Development (as set out in the section above) provides useful context as to why, in this particular case, such development is required in the Green Belt.

6.76 Further to this, the London Plan Policy SI 3 states that development plans should identify suitable sites for any necessary energy infrastructure, including energy storage. The Bexley Local Plan (2023) does not identify any suitable sites for energy infrastructure and storage.

6.77 The Site was chosen due to its close proximity to the existing Hurst Grid Substation at Stable Lane located approximately 1.45 km north-east of the main part of the site, into which it is proposed to connect to the electricity grid (hereafter referred to as a 'Point of Connection') and its lack of environmental impacts. The Borough's electricity grid is very constrained, with very few places locally having capacity to connect in. For an essential development such as the Proposed Development it is vital for it to be able to connect into the electricity grid. The existing NG Hurst Grid Substation at Stable Lane has been identified as the Point of Connection as it has the appropriate capacity to both take electricity from the grid for storage and to feed electricity back into the grid.

6.78 Having identified the existing Hurst Grid Substation at Stable Lane as having capacity for an ESS connection, the Applicant undertook a search for suitable land. It is considered that 3km is the likely maximum distance a cable connection could stretch without the Proposed Development becoming unviable. The search area for additional sites includes an area of 3 km around the Point of Connection, with closer sites preferred. The process for site selection meant the closest possible

site of sufficient size was 1.4 km away from the Point of Connection, with four sites being more than 2.45 km from the Point of Connection, significantly further than the Proposed Site, rendering them almost certainly unlikely to be commercially viable.

6.79 All other potential sites on brownfield land were of an insufficient size and there were no other sites found on lower quality agricultural land.

6.80 It is considered that 3 km is the likely maximum distance a cable connection could stretch without the Proposed Development becoming unviable, with sites closer than 3 km being preferred. As such, moving the site any further away from the existing substation to be located outside of the Green Belt would potentially make it unviable to develop and/or compromised the efficiency of the various balancing Services it will be providing. Furthermore, projects such as the Proposed Development should be as close as possible to the DNO / National Grid substation in order to provide a stable and reliable service. This is the key reason why the Proposed Development needs to be where it is and why land outside of the Green Belt was not an option.

Site Selection Criteria

6.81 The Site has been strategically chosen for its location to the existing Hurst Grid substation at Stable Lane, which lies 1.45 km north-east of the ESS compound site. The substation is capable of accommodating the transfer of large amounts of electricity to and from the Site at a viable cost, which will provide valuable support to the grid, protecting customers at times when high demand places stress on the local and national electricity network. As a result of the location of the Site to the existing substation, underground cables will avoid any major infrastructure, minimising connection and transmission costs. The scale of the underground grid connection required will also significantly minimise construction related disruption.

6.82 The other key criteria in selecting a location for the Development include:

- Separation from residential areas and settlements, including sensitive uses such as schools and hospitals;
- Suitable site area and shape required for the Proposed Development;
- Existing visual screening provided by trees and hedgerows around the perimeter of the Site, particularly to the north;
- Ease of access to the site for construction and HGVs using an existing field or farm access, (minor widening is required to the existing junction on A223 N Cray Road and North Cray Road to facilitate the Proposed Development);

- Suitable topography for the Proposed Development; and
- Lack of environmental constraints (e.g., statutory ecological designations, heritage assets, flood risk, etc).

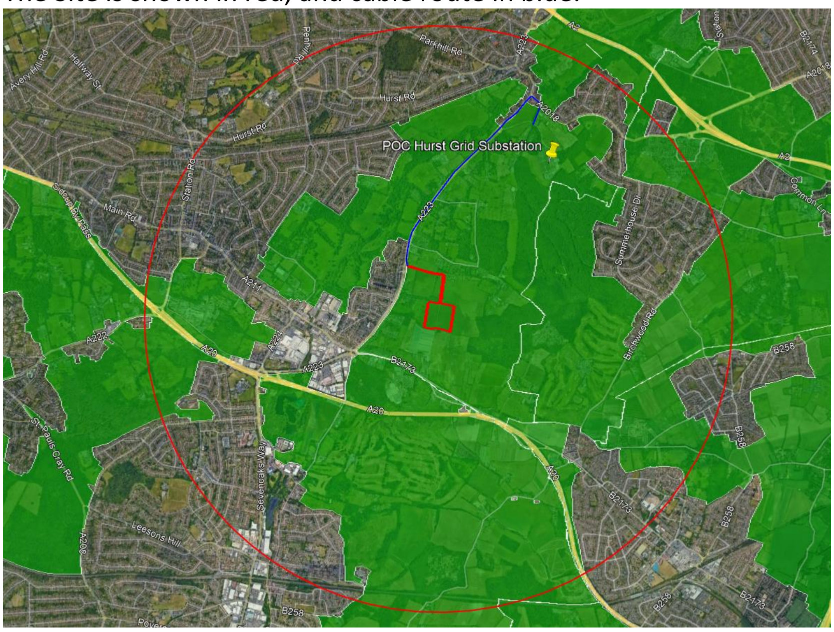
The Search Area

6.83 It is important to identify a proportionate and appropriate area of search (hereafter referred to as the 'Search Area') from which potential additional sites are identified for this site selection process. There is no specific guidance in relevant planning policy documents to determine the geographic area that should be applied. The Search Area for this assessment has therefore been based on the requirement to connect the Proposed Development to a local electricity distribution network (hereafter referred to as the 'grid') and the parameters associated with this, because any energy storage proposal without a feasible grid connection is not viable.

6.84 In this instance the Proposed Development is to connect into the existing substation on Stable Lane, north-east of the main part of the Site, and the search area has therefore been drawn around this as the Point of Connection. It is considered that 3 km is the likely maximum distance a cable connection could stretch without the Proposed Development becoming unviable. The Search Area for additional sites has therefore been defined to include an area of 3 km around the Point of Connection – please refer to Figure 2.2 below, which illustrates the Search Area. A site closer to the Point of Connection is still preferred, even when both are within 3 km.

Figure 2.2 – 3km Search Area with Green Belt

The Site is shown in red, and cable route in blue.



6.85 The existing Hurst Grid Substation lies within the Metropolitan Green Belt ('the Green Belt'). An existing substation is required for efficiency and to maximise the benefits to the national electricity network. The surrounding area within Bexley, Bromley, Sevenoaks and Dartford administrative areas is predominantly within Green Belt, and those areas not located within the Green Belt are existing settlements comprised of residential properties and town centres, business areas, strategic industrial land, waste management, heritage or nature sites (i.e. Conservation Areas, Registered Parks and Gardens), or land identified for open space (i.e. Borough Open Space,). This is demonstrated in Figure 2.3a[11] below and the Local Plan Policies Map extracts at Figures 2.3b and 2.3c. Further to this, there are no other suitably sized sites within 3 km of the substation which are not within the Green Belt.

6.86 Further to this, the larger open parcels of land outside of the Green Belt near the Site (identified by the red stars in Figures 2.3b and 2.3e), are allocated for residential allocation (Sevenoaks) education and/or social and community services and facilities, Footscray Business Area (Bexley) or waste management facilities (Bromley) on the Bexley, Bromley, Sevenoaks and Dartford Local Plan Policies maps. The Bexley, Bromley, Sevenoaks and Dartford Local Plans do not identify any suitable sites for energy infrastructure, including energy storage, as per London Plan Policy SI 3.

Figure 2.3a – Green Belt and build-up land in 3km Search Area

[11] HM Government (2025), English local authority Green Belt dataset, available here https://www.planning.data.gov.uk/dataset/green-belt

Figure 2.3b – Bexley Local Plan Policy Map extract

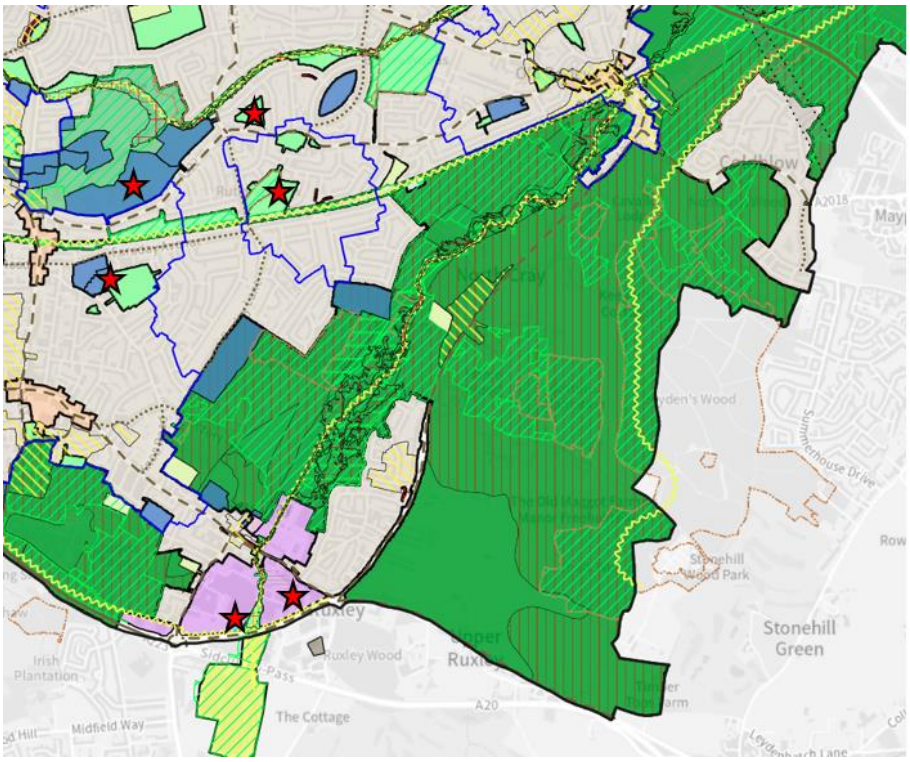


Figure 2.3c Dartford Local Plan Policy Map extract

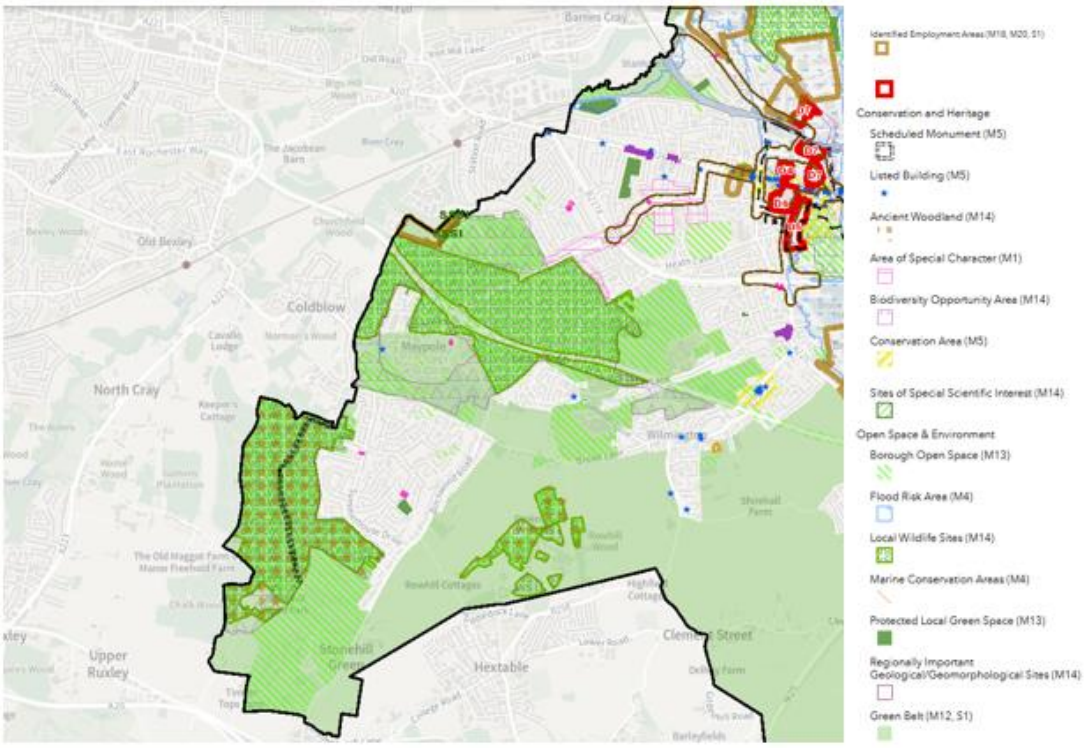


Figure 2.3d Sevenoaks Local Plan Policy Map extract

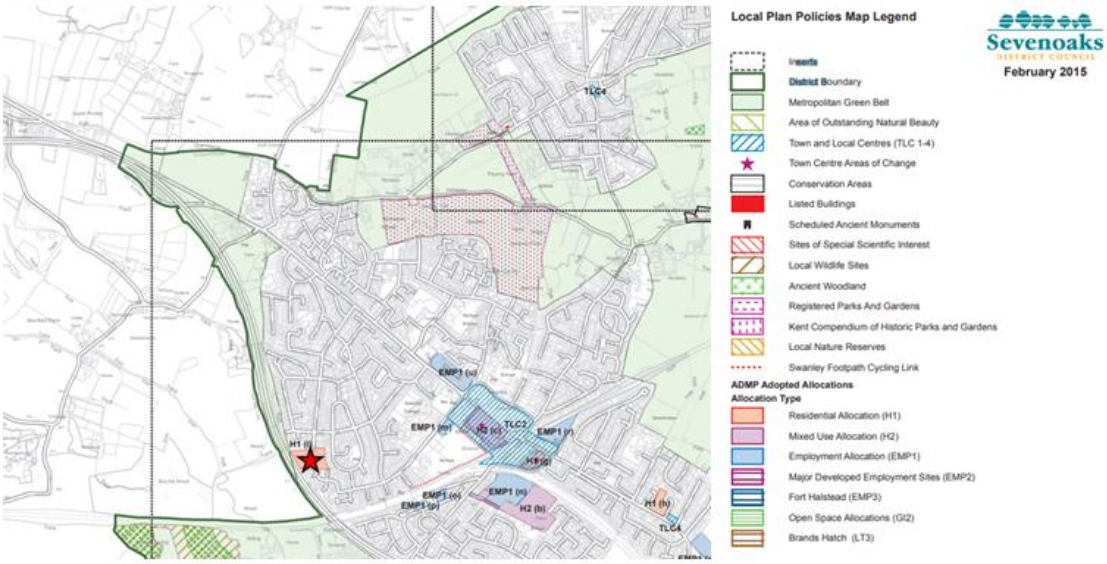
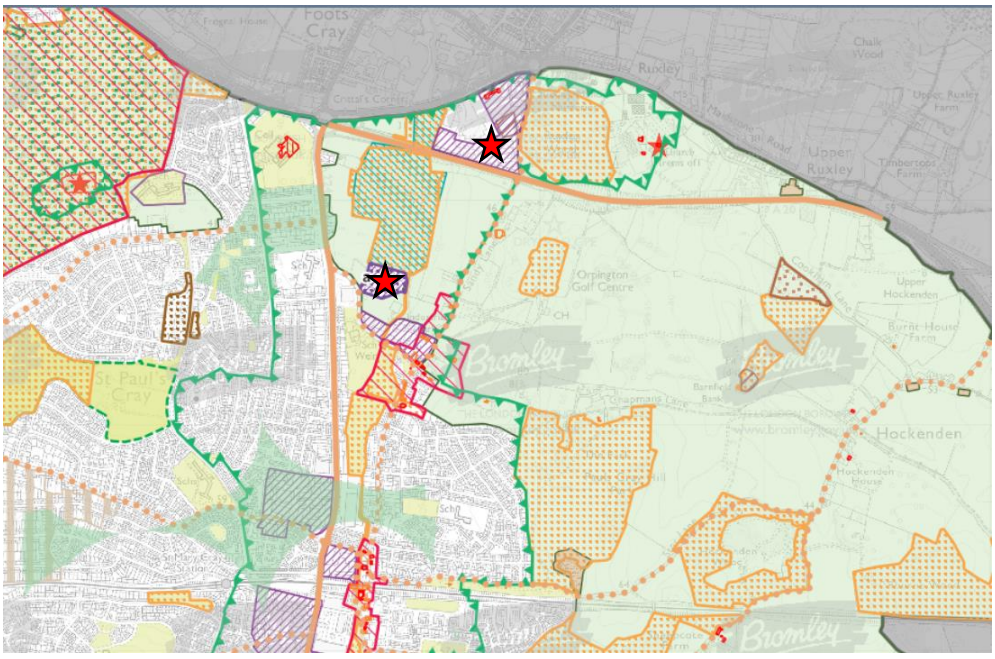
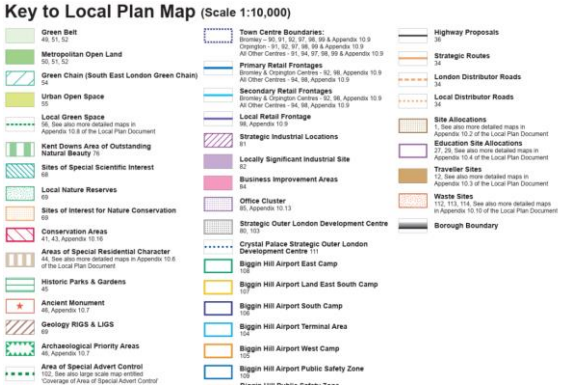


Figure 2.3e Bromley Local Plan Policy Map extract





6.87 Local Plan Policy DP31 requires that applications for renewable energy generation to be sensitively designed and to integrate into the local environment, minimising any potential negative impacts. With respect to the locational criteria specified by Local Plan Policy DP31, the Site Selection Report for the Proposed Development demonstrates there were no reasonable additional locations of sufficient size on brownfield land, with all but one of the five short-listed sites being located more than 1.4 km from the Point of Connection thereby representing greater distance than the Proposed Site. Given that all five short-listed sites are allocated within the Local Plan (for SIL or LSIL, or other Industrial land), there were limiting factors in terms of policy constraints or due to the allocations being made up of several lots that would need to become available via sale / auction to provide a sufficient size of land to accommodate the Proposed Development, and therefore unlikely to become available to the Applicant. These would likely lead to difficulties when designing and constructing an ESS, which would likely decrease total capacity and increase total cost.

6.88 Whilst the Proposed Development would require an underground cable to connect the Proposed ESS to the existing NG substation, this new infrastructure would be underground and therefore not visible during operation, with only temporary visual effects during its construction.

6.89 Notwithstanding the locational need for the Proposed Development to be within 3km of the substation, there are no suitable proposed site allocations for commercial, industrial, energy-related or miscellaneous development within the Bexley (2023), Bromley (2019), Sevenoaks (2011) and Dartford (2024) Local Plans within 3km of the substation, owing to their size being less than 7.0 ha (being the area of the Main Site) and/or constitute land for which the Applicant does not have control over. Despite this, in accordance with London Plan Policy E5 and S1, Bexley Local Plan Policy SP3, Dartford Local Plan Policy M20, Bromley Local Plan Policy 81 and Sevenoaks Local Plan Policy SP 8, which seek to protect employment and industrial lands and social and community infrastructure, the Proposed Development would therefore not limit the range and choice of such land in the area. London Plan Policy E5 seeks to protect and intensify the function of SIL's and while London Plan Policy E4 does permit 'utilities infrastructure such as energy and water', this is taken to refer to small scale infrastructure rather than a generating system such as ESS. Furthermore, the SILs within the 3 km search area either comprise already developed sites or are less than 7.0 ha in size.

6.90 The PDAS submitted with this application also demonstrates that there would be no cumulative adverse impacts on the landscape, natural environment and surrounding users, no adverse impacts on neighbouring land users, as a result of the Proposed Development during the operational phase.

6.91 As such, it has been demonstrated that there are no additional viable and available locations for the Proposed Development outside of the Green Belt, and as a result no sites were found to compromise a more feasible alternative. The lack of additional sites to deliver the benefits of the Proposed Development is considered to be a very special circumstance to which **significant weight** should be attached.

Swift Grid Connection

6.92 The Applicant benefits from an accepted grid connection offer with the UK Power Networks ('UKPN'), as such, the Proposed Development could be brought online feasibly within 1-3 years following the approval of the planning application. This is an important point as it has been well presented in the press that National Grid and Ofgem are in the process of updating the Grid Connection process due to the significant number of 'zombie projects' that are sitting in the connections queues which are taking up capacity and pushing grid connection dates out into 2030 and beyond. The availability to connect to the grid within a short time frame to deliver the benefits of the Proposed Development is considered to be a very special circumstance to which **significant weight** should be attached.

Economic and Social Benefits

6.93 Paragraph 87 of the NPPF recognises the specific locational requirements for different sectors and states that planning policies and decisions should make provision for the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

6.94 London Plan Policy GG5 seeks to ensure London's economy diversifies, and recognises and promotes the benefits of a transition to low carbon circular economy to strengthen London's economic success, while Policy GG6 emphasises that London must become more efficient and resilient by supporting the move towards a low carbon economy.

6.95 Bexley Local Plan Policy SP3 acknowledges that the Council will promote sustained economic development and employment growth by supporting proposals that broaden the mix of business uses and diversify the local employment offer.

6.96 The Proposed Development has the potential to support economic growth through the creation of jobs associated with ongoing maintenance of the grid scale energy storage, as well as a number of other indirect jobs associated with its construction and decommissioning.

6.97 The Proposed Development will result in business opportunities locally via jobs being created directly or via the supply chain plus indirect benefits in additional worker spend on hospitality in the local economy.

6.98 In terms of employment opportunities, the development is anticipated to result in jobs during the construction period, which will take approximately 12 months. Local contractors will be appointed wherever possible in order to maximise the benefits to the local economy. During the operation of the Proposed Development, the development will be operated remotely, with occasional inspection and maintenance visits which will occur on average once per month.

6.99 Overall, energy storage systems contribute to a more reliable, affordable, and sustainable energy supply in rural areas. They support local economic growth, job creation, and enhanced energy independence whilst facilitating the integration of renewable energy sources the rural energy mix.

6.100 As set out earlier in this Section, various documentation published by the HM Government and National Grid identify that a flexible and affordable energy system of which electricity storage is seen as a fundamental part, is important to reduce costs to consumers and keep energy bills low. The Proposed Development would assist in limiting costs, which has clear economic and social benefits.

6.101 The potential economic and social benefits of the proposal are considered to be a very special circumstance to which **moderate weight** should be attached.

Wider environmental benefits including planned biodiversity net gain

6.102 National and local planning policies and the London Plan place significant emphasis on the protection and enhancement of biodiversity. As detailed in the submitted Ecological Appraisal, much of the Site is considered to be of limited ecological value, comprising agricultural land sown with grass cover of negligible botanical value (Refer to the Ecological Impact Assessment). Notwithstanding, the Proposed Development seeks to provide a number of biodiversity enhancements as shown by the submitted Illustrative Landscape Masterplan Plan and the Proposed Development will result in a Biodiversity Net Gain ('BNG') of over +80% habitat units and +20% hedgerow units, well in excess of the mandatory 10%.

6.103 The delivery of BNG would be a significant positive contribution resulting from the Proposed Development and is a very special circumstance to which **moderate weight** should be attached.

The temporary and reversible nature of the proposal

6.104 Unlike many other forms of development, the Proposed Development would be temporary, for a period of 40 years. After this time, the Site would be decommissioned and returned back to its current use which could be secured by way of a suitably worded planning condition. Any impact of the Proposed Development on the Green Belt and the surrounding landscape is therefore temporary and fully reversible, thus avoiding any longer-term impact on its permanence.

6.105 This factor is acknowledged as contributing towards very special circumstances across a number of appeals and planning decisions for renewable energy within the Green Belt, as cited previously in this Report.

6.106 Planning Inspectors recognise that grid-scale energy storage can demonstrate the necessary very special circumstances to justify the grant of planning permission. The temporary and reversible nature of ESS were noted in appeal ref. APP/C3430/W/22/3292837, which was allowed by the Planning Inspectorate on 16th August 2022. The scheme was for a 50 MW battery storage located within the Green Belt. The Inspector noted:

"17. National policy advises that development should be located where impacts are, or can be, be acceptable. I consider that the location of the proposed development, adjacent to an existing GSP and agricultural buildings, together with the existing and proposed landscaping means that this would be the case here. Additionally, whilst the proposed development would be located at the site for a number of years, it is reversable and capable of being removed from the site." (Underline added by Applicant).

"18. Therefore, and in my judgement, the environmental benefits of the proposal and the fact that the impacts can be made acceptable, are sufficient to outweigh the harm to the Green Belt. Consequently, the very special circumstances necessary to justify the proposal do exist and the scheme would not conflict with LP Policy GB1 or the Framework".

6.107 As such, the temporary and reversible nature of the Proposed Development should be given **moderate weight** when considering the very special circumstances of this proposal.

Table 6.1 Very Special Circumstances and weighting for the Proposed Development

HARMS	BENEFITS
	MODERATE (Wider environmental benefits, BNG)
	MODERATE (Temporary and Reversible)
	MODERATE (Economic Benefits)
	SIGNIFICANT (Swift Implementation with agreed grid connection)
	SIGNIFICANT (Lack of Alternative Sites)
LIMITED (Heritage)	**SUBSTANTIAL** (Addressing Energy Security)
LIMITED (Landscape and Visual)	
LIMITED (Visual Openness)	
LIMITED (Spatial Openness)	**VERY SUBSTANTIAL** (Provision of Low Carbon Energy) The scheme will provide power to 647,590 homes
SUBSTANTIAL (Inappropriate Development in the Green Belt)	

7.0 CONCLUSIONS

7.1 The Proposed Development comprises the construction and management of 200 MW ESS, and other associated infrastructure on land at North Cray Road, Sidcup, to be known as 'North Cray Road ESS'.

7.2 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050, and in October 2021 committed to a net zero electricity system much earlier than this (2030). The Government's Clean Power 2030 document (released in December 2024) forecasts how much energy storage we need to decarbonise the grid by 2030 – being 23-27 Gigawatts of battery capacity and 4-6 GW of long duration energy storage. London Plan (2021) states (at Paragraph 9.2.1) that "*the Mayor is committed to London becoming a net-carbon city*". Whilst LBB is yet to declare a climate emergency, the Council has published a 'Climate Change Statement and Action Plan 2022 to 2026', which aims to reduce carbon emissions and supports low-carbon energy. Essentially there is a need to build out a significant number of these types of installations across the UK in order to meet grid demand and increase our security of supply by 2030. The Proposed Development therefore represents an opportunity to make an important contribution to this need and the National Government's, Mayor of London and London Borough of Bexley's climate change and energy security agenda.

7.3 One of the core planning principles of the NPPF is to encourage the use of renewable resources, for example by the development of renewable energy. Paragraph 157 of the NPPF states that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. Further to this, the London Plan Policy SI 3 states that development plans should identify the need for, and suitable sites for, any necessary energy infrastructure requirements, including energy centres, energy storage and upgrades to existing infrastructure.

7.4 The 2024 revised NPPF introduced the definition and criteria for establishing a site within the Grey Belt and a Framework (Paragraph 155) to determine whether the proposed development of such sites would be considered 'not inappropriate' development in the Green Belt. The 2025 updated PPG clarifies at Paragraph: 014 (Reference ID: 64-014-20250225) that Footnote 55 of the NPPF sets out that development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

7.5 The Site is considered to be within Grey Belt and the Proposed Development would satisfy the relevant Criteria within Framework Paragraph 155 of the NPPF. As such, the Proposed Development is considered to be 'not inappropriate' development in the Green Belt.

7.6 The NPPF and NPPG clarify that if development is considered to be not inappropriate development on previously developed land or Grey Belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

7.7 Notwithstanding, should LBB determine that the Site is not Grey Belt and the development is inappropriate development in the Green Belt, the Applicant has set out an assessment of impact on spatial and visual openness, and harm and any other harm to the Green Belt and has set out a case for very special circumstances. The Proposed Development would cause a degree of limited harm to the Green Belt by virtue of being inappropriate development and because of the reduction in 'openness' it would involve. In addition, there would be a limited degree of harm to the landscape. The Proposed Development is, however, temporary therefore the harm to the Green Belt and the wider landscape would be reversible.

7.8 Paragraph 153 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Paragraph 160 of the NPPF states that very special circumstances will need to be demonstrated if renewable projects are to proceed in the Green Belt. It continues by stating that very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. In this case, it is considered that any harm by reason of inappropriateness is clearly outweighed by other considerations, which amount to very special circumstances. Those very special circumstances, and their weighting as shown in **Table 6.1**, include:

- **Provision of Low Carbon Energy:** The need for renewable energy generation and its role in meeting the challenge of climate change (**substantial weight).** The Proposed Development would have a renewable energy generating capacity of 200 MW which would meet the needs of approximately 647,590 homes for 2 hours. Furthermore, the Proposed Development's contribution to reducing the UK's reliance on finite resources such as fossil fuels and making an important contribution towards the Government's climate change agenda and Net Zero Target – **substantial weight**;
- **Addressing Energy Security:** The Proposed Development will support the continued deployment and generation of UK renewable energy (solar and wind) to ensure we have a secure supply of energy, not reliant on imports – **substantial weight;**

- **Lack of Additional Sites:** The requirement for the grid-scale energy storage system (ESS) in this location and there being no demonstrable better sites in the search area – **significant weight**;
- **Swift Grid Connection:** with an agreed connection and could be operational with 1-3 years – **significant weight**;
- **Economic Benefits:** Support for the rural economy and contribution to the sustainable growth and expansion of all types of business in Greater London – **moderate weight**;
- **Wider Environmental Benefits:** including the delivery of biodiversity and landscape enhancements, resulting in Biodiversity Net Gains well in excess of the mandatory 10% - **moderate weight**; and
- **Temporary and Reversible:** The temporary and reversible nature of the proposal – **moderate weight**.

7.9 In conclusion, it is considered that the Proposed Development would not give rise to unacceptable environmental effects and when all of the benefits of the Proposed Development are combined, they clearly outweigh any harm to the Green Belt and any other harm, in accordance with the NPPF (see table 6.1 above). As such, it is considered that Very Special Circumstances exist, complying with the NPPF, London Plan Policy G2 (London's Green Belt) and Local Plan Policy SP8 (Green infrastructure including designated Green Belt) ad Policy DP31 (Energy Infrastructure).

7.10 Furthermore, Table 6.2 overleaf provides a non-exhaustive list of energy storage system schemes which have been recently approved within the Green Belt and within the Grey Belt.

7.11 The Applicant therefore respectfully requests that planning permission is granted for the Proposed Development.

Table 6.2: Sample of Energy Storage System Appeals Recently Approved in the Green Belt and Grey Belt

APPLICATION REF.	DESCRIPTION	ADDRESS	APPROVAL DATE
Grey Belt			
APP/V4630/ W/24/3347424	Construction of a temporary 49.35MW battery energy storage facility, with security fencing, access and associated works	Land off Chapel Lane, Great Barr, Walsall	13 January 2025
APP/Q4245/ W/24/3354822	Erection of a 35 MW battery storage facility with boundary fencing, landscaping and associated infrastructure	Land at Wild Fowl Farm, Carrington Lane, Carrington, Greater Manchester M31 4AD	17 February 2025
Green Belt			
APP/N5090/ W/22/3298962	Installation of a battery storage facility including inverter and transformer stations, battery storage containers, other associated infrastructure works, security fencing and lighting	Land west of National Grid Mill Hill Substation, Mill Hill NW7 1NT	13 March 2023
APP/K0425/ W/22/3294722	Temporary planning permission (25 years) to undertake the development works required for the construction and operation of a 7.2MW battery energy storage facility, associated infrastructure and landscaping	Land off Coldmoorholme Lane, adjacent to the GSP, Well End, Bourne End, SL8 5PS	31 July 2023
APP/N5090/ W/22/3298962	Installation of a battery storage facility including	National Grid Mill Hill GSP, Land west of National Grid Mill Hill	13 March 2023

	inverter and transformer stations, battery storage containers, other associated infrastructure works.	GSP, Mill Hill NW7 1NT	
APP/H1705/ W/21/3289603	Installation of battery storage facility with associated works.	Land at OS 464762 159811, Minchens Lane, Bramley, Hampshire	26 January 2023
APP/N2739/ W/22/3300623	Construction of a zero-carbon energy storage and management facility including containerised batteries, synchronous condensers and associated infrastructure.	Rawfield Lane, Fairburn, Selby LS25 5JB	1 December 2022
APP/C3430/ W/22/3292837	Construction, management and operations of a battery based electrical storage scheme with associated infrastructure.	Staffordshire Railway Walk, Wolverhampton, WV4 4XX	16 August 2022
APP/P0119/ W/20/3261646	Installation of 49.5 mw gas peaking plant and ancillary development.	National Grid site, Land off Larks Lane, Iron Acton, Gloucestershire	25 March 2021

APPENDIX 1 – NPPG ASSESSMENT TABLES (PARAGRAPH: 005 REFERENCE ID: 64-005-20250225)

Purpose A - to check the unrestricted sprawl of large built up areas
This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land's contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or none	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Purpose B – to prevent neighbouring towns merging into one another
This purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation

Weak or none	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Purpose D – to preserve the setting and special character of historic towns
This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

Contribution	**Illustrative Features**
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or none	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town