



The countryside charity
Derbyshire

For the attention of the Planning Officer, developmentcontrol@ne-derbyshire.gov.uk

10 March 2023

RE: 22/01247/FL

Planning application for a battery energy storage system (BESS) together with associated infrastructure including switchyard, control room, DNO switch room, acoustic barrier, landscaping, biodiversity enhancement, internal access tracks, vehicular parking, underground diversion of section of existing 33kv overhead power line and two options for underground cable run between the BESS and switchyard (Major Development)

Dear Planning Officer,

CPRE Derbyshire objects to this proposal on the grounds of its adverse impact on the landscape and amenity of the area, contrary to National Planning Policy Framework (NPPF) guidelines, the North East Derbyshire Local Plan 2014-2034 and the requirements of the Derbyshire Spatial Energy Study 2022.

Background

Our primary focus is to ensure that the countryside is protected from detrimental impacts of inappropriate development and, in line with the NPPF guidelines on sustainability, is protected, promoted and enhanced for both current and future generations.

The value of countryside to people's wellbeing and as a buffer against climate change has never been more obvious and its heritage value, once lost or seriously degraded is virtually impossible to retrieve. Development proposals in open countryside or on undeveloped greenfield sites, we believe must be considered holistically in terms of what these places mean to people and contribute to communities now and for the future.

Regarding our renewable energy policy in particular, CPRE Derbyshire is supportive, but we acknowledge that such installations are industrial structures and therefore need to be carefully sited and of the right scale, in order to minimise damage to landscape character and amenity.

Reasons for Objection

North East Derbyshire Local Plan 2014-2034 Policy SS9: Development in the Countryside

National Planning Policy Framework - section 15, paragraph 174 Conserving and enhancing the natural environment

The CPRE, nationally and locally, supports appropriate development first and foremost on brownfield land. Recycling brownfield sites is the most sustainable option and is especially suitable for developments of an industrial nature such as this.

NPPF section 15 para 174(b) states that *“planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services”*.

Local Plan Policy SS9, para 2 states that *“In all cases, where development is considered acceptable, it will be required to respect the form, scale and character of the landscape, through careful siting, scale, design and use of materials.”*

This proposal is a large, industrial scale installation by any standards, comprising 32 shipping container style battery containers, 32 inverters, 2 substations, control room, transformer station, switchroom, switchyard and an acoustic barrier. Having visited the site and surrounding area, the scale, design and materials proposed here are clearly incongruous with the visual amenity and character of this greenfield landscape. By way of example, a 5-metre-high acoustic barrier cannot be satisfactorily mitigated by planting *and* remain in character with the landscape.



North East Derbyshire Local Plan 2014-2034 Policy SDC10: Decentralised, Renewable and Low Carbon Energy Generation

National Planning Policy Framework - part 15, paragraph 174 Conserving and enhancing the natural environment

CPRE Derbyshire is also very concerned about the implications of noise and light disturbance on the tranquillity of the countryside.

Local Plan Policy SDC10(b) states that proposals *“will be permitted where either individually or cumulatively with other renewable energy development, there would be no significant adverse effects on the amenity of local residents, in terms of noise, dust, odour, reflected light, traffic or visual intrusion.”*

NPPF section 15, para 174(e) states that *“planning decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to... unacceptable levels of soil, air, water or noise pollution”*.

The noise from the operation of this facility would be noticeable to residents and walkers in the area and is out of context with the rural area. At the time of our site visit, there was a constant audible hum from the existing 20MW BESS facility (ref. 18/01011/FL) from the adjoining lane. The proposed development is five times the size of this existing facility in terms of energy production. For operational and security/insurance reasons, it is presumed that lighting would be a necessity (planning documents unavailable online at the time of writing). Whether this is permanently on in the hours of darkness or

motion-triggered, the light pollution on a development of this scale has the potential to disrupt wildlife and restrict people's ability to observe the night skies.

Considered alone, this proposal has an unacceptable adverse impact on both landscape and public amenity. Taken in the context of other nearby energy developments (substation, solar farms and the adjoining existing 20MW BESS installation), far from being in keeping with the area, the **cumulative impact** of introducing this additional facility would further magnify the adverse impact on the landscape and the amenity value of nearby residents. Other sensitive receptors would be aware, as they travel through the local area, of its transformation from rural to industrial in nature; quiet country lanes surrounding the site and public rights of way Calow FP17, FP20 and FP26 being in close proximity.

Planning Balance

CPRE is a passionate advocate for climate action and supports schemes that minimise landscape impacts, secure real nature recovery opportunities and enjoy the support of local communities. Schemes like this one, that fail to meet these expectations, should be refused.

Derbyshire County Council published its [Derbyshire Spatial Energy Study](#) in late 2022. At 99MW, this proposed installation is bigger than any current or planned installations in the county (table 4.4, page 46). The stated objectives for energy storage deployment in North East Derbyshire by 2040, range from a steady progression of 0.4MW to a "Leading the Way" target of 12.5MW (table 5.8, page 67). One can reasonably surmise from this that even the most ambitious target in our district could be achieved by an additional single small BESS or multiple smaller installations.

On balance, there is no requirement for an installation of this size to deliver either the district or county energy storage objectives, let alone using the countryside to do so.

We respectfully ask for this application to be refused.

Yours,

John Ydlibi (Chair, CPRE Derbyshire, the countryside charity)

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