

Ms Nadia Hussain
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Dear Nadia,

Re: APP/C3430/W/24/3344658 - Statement on NPPF Reforms and Written Ministerial Statement

I write in relation to the above referenced appeal at Land on the Southwest side of Levedale Road, Penkridge, Staffordshire, ST18 9AH which is for the construction of a Battery Energy Storage Scheme (BESS) and associated works. Following your invitation to submit representations following the publication of the proposed reforms to the NPPF and the Ministers Statement 'Building the Homes we Need' on 30th July 2024, the Appellant wishes to make the following statement.

It is clear from the contents of the Written Ministerial Statement and the proposed reforms to the NPPF that there is greater importance being placed on the drive towards meeting the Government's commitment to zero carbon electricity generation by 2030 with renewable energy projects such as the Appeal Proposals being "critical" to achieving this.

Written Ministerial Statement (WMS)

In terms of the Witten Ministerial Statement, one of the key objectives is 'building infrastructure to grow the economy'. In relation to the Appeal Proposals, as detailed within the Appellant's Statement of Case, the 'critical' need for renewable energy generation was discussed in the hearing and it reflects the National Policy Statements for Energy referral to Battery Energy Storage Schemes being a 'Critical National Priority'.

Within the WMS, the Secretary of State notes the removal of the ban against on-shore wind but critically, notes that they '*must go much further*'. The direction of travel prescribed in the WMS is clear in that it sets out that not only is there a clear and "critical" need for renewable energy development but that these projects should be promoted with the weight in the planning balance associated with the provision of renewable energy and indeed, the associated benefits of such developments should be boosted in order to reflect the critical nature of the need to move towards zero carbon electricity generation by 2030.

The Appeal Proposals are not affected by transmission level grid network reinforcements and so can be delivered quickly ahead of 2030, in comparison to many schemes which have connection dates in the mid-2030s. The deliverability of the scheme and delivery of benefits pre 2030 should weigh in favour of the proposal.

Proposed NPPF Reforms

In this instance, the starting point for assessing the draft text for the proposed NPPF Reforms is draft paragraph 164. The draft wording for the paragraph now includes the direction that Local Planning Authorities should “support planning applications for all forms of renewable and low carbon development”.

Notably, part a) has been strengthened stating that applicants are not required to demonstrate the overall need for renewable or low carbon energy and LPAs should give ‘**significant weight** to the proposal’s contribution to renewable energy generation and a net zero future’.

As has been presented within the Appellant’s Statement of Case, the Appellant reinforces that the provision of a BESS facility would attract significant weight in the planning balance. The appeal development’s ability to ensure renewable power is stored for periods when there is supply and no power demand, allowing more renewable energy to be used.

Proposed reforms to the National Planning Policy Framework and other changes to the planning system (2nd August 2024)

As reflected in the proposed draft wording within draft paragraph 164 of the NPPF, the consultation document setting out the rationale for the proposed reforms within Chapter 9 reinforces the increase in support for renewable energy schemes.

Again, great emphasis has been placed in meeting the target of reaching zero carbon electricity generation by 2030 stating that ‘boosting the delivery of renewable energy is vital’ to achieving this. As stated within National Policy for Energy EN-1, battery energy storage schemes are critical infrastructure in delivering renewable energy through the ability to store renewable energy at times of lower demand and higher supply and to release power to the National Grid at times where demand surges.

It is concluded therefore, that the Appeal Proposals would make a clear and demonstrable contribution to the government’s aim of achieving zero carbon electricity generation by 2030 through the delivery of a Battery Energy Storage Scheme that has secured a grid connection meaning that will be energised prior to 2030. As such, in light of the above, the Appellant considers that significant weight should be afforded to the provision of renewable energy infrastructure. Further, the weight afforded to the associated benefits of renewable energy, including national energy security, job creation and powering local businesses and homes should be ‘boosted’ in line with the proposed reforms to the NPPF.

I trust that the above is clear. However, should you require any further information or have any questions regarding the above statement, please do not hesitate to get in contact with one of my colleagues or myself on the details below.

Yours sincerely,



Jake Farmer BA(Hons) AssocRTPI AIEMA
Associate Planner
DLP Planning Limited



dynamic development solutions™

Direct Dial: 07867 171786

Email: jake.farmer@dlpconsultants.co.uk