

S25/1534

Proposals: Erection and operation of an energy storage system including associated infrastructure, engineering works, landscaping and formation of vehicular access from highway. With outline application (all matters reserved) for the erection and operation of a transmission substation with associated infrastructure.

Site Address: Land East Of The B6403 High Dike, Stoke Rochford, Grantham NG33 4EB

Summary of Information Received

Councillor Bellamy has submitted a representation (copied below), which refers to an appeal decision in Slough (Appeal Ref: 3366043) for a development of a Data Centre and Battery Energy Storage System (BESS) with ancillary infrastructure.

The representation suggests that the Appeal Decision identifies that the weight to be given to the economic and social benefits associated with battery storage should be reduced because this is already accounted for within the weight given to the benefit of the electricity supply.

The representation states that this means that the site provides only one significant benefit, which is the electricity supply. All other benefits should be removed to avoid double counting.

Officer Comments

Whilst the matters raised within the appeal decision are noted, it is Officer's assessment that planning balance contained within the Officer Report (OR) does not double count any benefits. Section 10 of the OR sets out the planning balance, this balance includes the following matters identified as public benefits:

- The contribution the proposal makes towards energy security and transition to net zero – significant weight
- Economic benefits associated with jobs associated with the construction and operation of the scheme – limited weight
- Environmental benefits associated with the significant excess in biodiversity net gain – significant weight.

It is Officer's assessment that these matters are identified as distinct, direct benefits and, therefore, are appropriately given individual weight in the planning balance. The OR does not give any weighting to any indirect benefits associated with the development or any matters intrinsically linked to the energy benefits of the development.

In addition, following further review, it is Officer's assessment that the proposed Biodiversity Net Gain provisions should be appropriately secured through a split of planning conditions and a Section 106 Agreement.

The Section 106 Agreement Heads of Terms would secure the following:

- BNG Monitoring Fee – the financial contribution would be determined by the number of units created per low, medium and high distinctiveness.
- Access to the site to undertake the BNG monitoring visits
- Prohibition on the landowner selling any additional net gain units (above the mandatory 10% requirement) as part of a habitat bank site.

Planning conditions are therefore proposed to secure details of the Biodiversity Gain Plan, Habitat Management and Monitoring Plan, as well as notification of the commencement of the BNG works. These conditions would be included on the full and outline permission to be granted as part of this hybrid application. The conditions to be included are as follows:

HMMP Details

The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP)], prepared in accordance with the approved Biodiversity Gain Plan and including:

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

The development shall be undertaken in accordance with the approved details.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 (and policy EN2).

Monitoring Report Submission

Monitoring reports shall be submitted to the local planning authority in writing in accordance with the methodology and frequency specified in the approved (HMMP).

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 (and policy EN2).

Notice of HMMP Commencement

Notice in writing shall be given to the Council when the Habitat Management and Monitoring Plan (HMMP) works have started.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

Updated Recommendation

To authorise the Assistant Director – Planning and Growth to GRANT planning permission subject to conditions, including the additional conditions above, and subject to the completion of a Section 106 Agreement.

Double Counting Benefits

This battery site only really does one thing it provides electricity. Pretty much all the other claimed benefits are a product of that electricity supply. If you count them all separately and count the electricity supply you are double counting.

The 10th of June Planning Inspectorates Decision Ref APP/J0350/W/25/3366043 dealt with this precise issue. The Secretary of State expressly reduced the weight given to some benefits because weight had already been attached to the underlying need.

He reduced the Inspector's weighting of economic benefits and gave no additional weight to social benefits where this would duplicate the weight already attributed to need.

Any benefit which occurs as a consequence of the electricity supply function is already accounted for in the weight assigned to that electric supply.

Flexible electricity storage is the core benefit. Renewable integration, grid flexibility, reduced curtailment, resilience, carbon savings and support for the transition to net zero are not separate benefits where they simply describe the consequences of charging, storing and later discharging electricity. Giving each of those headings additional substantial weight, on top of the underlying need for storage, would count the same benefit more than once.

The same applies to the claimed economic and social benefits. Where they simply flow from the project's electricity-storage function—such as supporting businesses, investment or wider economic resilience—they should not receive separate weight.

Additional weight should be confined to genuinely distinct, local and evidenced benefits.

In practice this site only provides one significant benefit and that is electrify supply. The weight attached to virtually everything else should be removed to avoid double counting.