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Dear Sir

A SMART, FLEXIBLE, ENERGY SYSTEM A CALL FOR EVIDENCE

Thank you for the opportunity to contribute towards the development of government policy on facilitating a smarter, more flexible energy system

Nexus Planning is an independent planning consultancy that has advised on a number of renewable energy projects, small scale energy and battery storage.

As you are aware, in England, battery storage (and small scale energy generation) are treated as sui-generis uses with no explicit policy framework provided in the National Planning Policy Framework or guidance in the Planning Practice Guidance. As such there is no explicit guidance on how such applications are to be treated or how Local Plan policies are to be framed. Accordingly, we are not aware of any adopted Local Plan policies that deal specifically with Battery Storage.

Our experience is that such proposals, and other energy projects, come forward on site of an industrial character or on agricultural holdings (as part of existing built areas) or on stand-alone sites. Battery storage can take place in converted existing buildings or in purpose built developments.

The minimal environmental, traffic or other impacts of battery storage make such locations entirely suitable, however planning approval is required, both for changes of use and new build schemes. Whilst our experience is that local planning authorities are generally supportive, the need for planning approval does introduce potential delays and uncertainty particularly on a new build sites outside of established industrial areas. Equally in industrial or employment areas, experience of small scale energy generation projects suggests that, as the use sits outside of the B use classes, loss of employment land issues may be raised.

In maintaining and developing the supportive planning context for battery storage schemes consideration could be given to:

- Guidance in Planning Practice Guidance on the locational requirements for cost effective and efficient battery storage – not least proximity to the grid and distribution network and to areas of

demand. This should also refer to the contribution that such proposals make to promoting sustainable economic growth. This can then be reflected in Local Plan policies.

- The scope for permitted change of use from industrial / agricultural uses to battery storage subject to certain criteria – such as floorspace and external appearance.

We trust these comments are helpful.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P. Tooher', written in a cursive style.

Peter Tooher
Director