Written evidence submitted by Origin Power Services Limited (NPS0005)

I am writing in response to the call for evidence with respect to the NPS Energy.

Origin Power Services Limited provides consultancy services to companies that develop renewable energy generation projects, both national infrastructure and planning applications that fall within the remit of local planning authorities.

The draft NPS is welcomed as it provides a clear policy statement and framework for the consideration of national energy infrastructure projects. However, whilst the draft policy states that the NPS will be a material consideration for local planning authorities if policy matters addressed in the NPS are not covered in the local plan, I am of the view that this is not sufficient. A much stronger signal should be given by the Government to LPAs as to the materiality of the NPS and, if necessary, this should be set out in planning practice guidance to LPAs.

In addition, technology type and its contribution to net zero should not be a matter for local authorities when determining planning applications. All energy infrastructure which supports the net zero target should be supported and this should be made clear in both the NPS and planning practice guidance as well as guidance to Inspectors. An example of this is two applications considered by Hertsmere Borough Council.

Development of ar	n energy storage system for a temporary period of 20 years
from date of first import/export	of electricity to include a battery storage compound, electricity
compound, fencing undergrour	nd cabling and other associated works, hedgerow and tree
planting and new access from	(Outline Application with all matters
reserved)	

Extract from officer's report

"The agent has stated that the proposal would help store renewable energy generated elsewhere in the country which would be surplus to requirements for distribution at other times of peak activity on top of energy that is already distributed on the grid from non-renewable sources. Whilst Officers note that the proposed battery storage facility would be sited within close proximity to an existing electricity transforming station, located further along no specific details have been provided by the agent as to what extent the electricity that is produced at the nearby transforming station would percentage of energy produced would originate from renewable or non-renewable sources. For example, Officers would see a more appropriate link between an existing power generating site, such as a wind, solar, or waste to energy plant, whereby power would be generated from a more renewable source rather than in this case, whereby Officers have not been provided with enough detail on the source of the electricity currently being provided, for example a high percentage of the electricity being produced may be from non-renewable, highly polluting energy sources.

The ESS is not a low carbon energy source in itself as it would simply store energy with the average carbon factor from the national grid. Ideally such a facility should be

co-located alongside renewable energy sources to ensure it stores low carbon energy and ensures this can be used at times of lower generation, thereby maximising the benefits as set out in section 14 of the NPPF.

Extract from Appeal Decision

25. In addition, although the appellant refers to the benefits of the ESS as being significant ¹⁶, the submitted information does little to quantify the extent of the service that would be provided to the electricity supply network at regional or national level. Neither is there any reference to what extent, if any, this is already being addressed within the wider DNO. Overall, I am not assured that there are no suitable alternative sites that might deliver similar benefits that would not result in similar harm to the Green Belt. Nevertheless, in view of the general support the proposal would provide to the transition to a low carbon economy, this matter attracts moderate weight.

Installation of renewable led energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with substation, inverter/transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping and biodiversity enhancements.

P112 Committee Report with reference to application

"(Note that the energy to be stored would not necessarily have been generated from renewable sources.)"

P113 Committee Report

"It is considered that only limited harm would be caused to the open character of the Green Belt, and that the wider environmental benefits associated with increased production of energy from renewable sources, together with other public benefits including a significant gain in biodiversity on the site, constitute very special circumstances which clearly outweigh that harm. The change of use of the land for renewable power generation would be temporary (for 35 years) after which the land would revert to its former agricultural use, and it would be only partial because parts of the site would be set aside as areas for wildlife and biodiversity, and because parts of the site can be used for the grazing of livestock."

The LPAs assessment of this application indicates that it considers that battery energy storage on its own is not an acceptable form of generation irrespective of its benefits in terms of balancing and providing grid flexibility services to support low carbon energy generation.

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