

Rebecca Payne

From: Amanda Scholes on behalf of Planning.Responses
Sent: 28 January 2022 10:20
To: Planning Scanning
Subject: FW: 95888 Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL
Attachments: 3453_L_GA_0_01B_Landscape General Arrangement.pdf; 3453_L_Outline Plant Schedule.pdf; 3453_Bilsham_LVA - FV1.pdf; Appendix 2.pdf
Importance: High

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From: Anita Gardner <Anita.Gardner@arun.gov.uk>
Sent: 27 January 2022 10:33
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: 95888 Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL
Importance: High

Please scan as consultee response

Anita Gardner
Principal Planner

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From: Sue Howell <Sue.Howell@arun.gov.uk>
Sent: 20 January 2022 11:35
To: Anita Gardner <Anita.Gardner@arun.gov.uk>
Subject: FW: 95888 Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL
Importance: High

Hi Anita

I have viewed the attached information and re-reviewed the LVA re impact.

My view remains unchanged in that whilst the location does offer significant screening the proximity to proposed and existing residential should still be a consideration of any decision.

I would suggest that the Appeal Decision re Prowe's Lane, Sedgemoor is somewhat irrelevant, as whilst it may demonstrate a scheme tested at appeal, this application should be looked at on this applications detail and setting alone.

I will defer to others for consideration of viewing the proposal in isolation, and the conclusion that it conflicts with the Arun Climate Emergency declaration and whether or not the development should be considered in the wider context of the government's objective of mitigating and adapting to climate change. (Should William Page – Arun's Climate Change and Sustainability Manager not be consulted on this matter)

My last point would be specifically re the detail contained within the revised Landscape General Arrangement dwg. Further detail would need to be supplied re actual quantities of the heavy standard trees indicated for the embankment screening. It would also be prudent to have an element of smaller understory native planting incorporated into this area which would provide low level screening and would assist in the stabilisation of the embankment as the planting only of heavy standard specimens into made up ground has the potential to be problematic re-establishment and un-stabilising on the embankment structure.

Kind regards

Sue

Sue Howell
Leisure and Landscape Officer,
Greenspace + Emergency Planning

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From: Mark Cullen <[REDACTED]>
Sent: 19 January 2022 11:17
To: Anita Gardner <Anita.Gardner@arun.gov.uk>
Cc: Sue Howell <Sue.Howell@arun.gov.uk>; Jonathan Cooper <[REDACTED]>; Sarah Hawkins <[REDACTED]>; Jamie Wiltor <[REDACTED]> 'James Sleigh'
<[REDACTED]> 'Philip Silk' <Philip.Silk@arun.gov.uk>
Subject: RE: 95888 Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL
Importance: High

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Hello Anita,

Further to the landscape officers comments dated 12th January (copying Sue Howell in for completeness), we have attached an updated landscape general arrangement plan with the revised section detail and also the associated outline plant schedule. The only piece of information we have not provided is the maintenance operations but happy for this to be covered by a planning condition and this information is typically found in a LEMP.

In terms of the considerations of residential dwellings this is covered in the Landscape Visual Appraisal we submitted with the planning application, key paragraphs being:

- 7.6 Private Views – viewpoint 4;
- 11.7 Appraisal of effects on private views;
- 11.8 Viewpoints 4 and 5 – visual effects description.

Our report is attached again for completeness. With regard to Sue's observations that *"The potential impact of the proposals would be considerable on the location and how the proposals comply with the Climate Emergency declaration should be demonstrated"*. On this point it is very important that I direct you to Appendix 2 attached, notably paragraphs 5 - 10. Viewing the proposal in isolation, it would be easy to conclude that it conflicts with the declaration you mention, however the development should be considered in the wider context of the government's objective of mitigating and adapting to climate change, including moving to a low carbon economy. The NPPF already states that the planning system should support renewable and low carbon energy and associated infrastructure (para 152). The appeal decision I have attached does provide further information that has been tested at appeal regarding *"Whether the development would be consistent with development plan policies that seek to limit carbon emissions, and with the Council's declaration of a Climate Emergency"* (in this case the site was located within the setting of Sedgemoor District Council's AONB).

I hope that all helps and, Anita, it would be great if you could acknowledge receipt of all the supplementary information I have provided you over the last couple of weeks.

Kind regards,
Mark

MARK CULLEN MRTPI
Associate



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From: Mark Cullen

Sent: 10 January 2022 15:09

To: 'Anita Gardner' <Anita.Gardner@arun.gov.uk>

Cc: 'Jonathan Cooper' <Jonathan.Cooper@arun.gov.uk>; Sarah Hawkins <Sarah.Hawkins@arun.gov.uk>; Jamie Wilton <Jamie.Wilton@arun.gov.uk>

Subject: RE: 95888 Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL

Hello Anita,

I trust you are back from leave and catching up. As promised, we have had the attached Fire Rescue Plan produced.

We have proposed to position a Fire Hydrant within the red line boundary but outside of our compound which will be connected back via a new water pipe which will also provide fresh water to our welfare cabin in the southern corner.

We have highlighted the width of the road adjoining our site – 11.4m, which is over three times the “Minimum width of road between kerbs (m)” recommended in Table 15.2 within the ‘Approved Document B Volume 2, 2019 edition’. The full turning circle of a fire truck is 16.8m meaning a truck should be able to turn in three points here (If you think a SPA showing this turn would be useful then we can have this commissioned but hopefully from the basis of the above this should allay any concerns – please let me know). I have attached a photo which may help further the cause, showing the width.

If you wish to carry out a site visit to assess further the landowner would be amenable to this, again, please let me know.

I look forward to hearing from you soon on the basis of the above and below.

Mark

From: Mark Cullen

Sent: 06 January 2022 15:50

To: 'Anita Gardner' <Anita.Gardner@arun.gov.uk>

Cc: 'Jonathan Cooper' <Jonathan.Cooper@arun.gov.uk>

Subject: RE: 95888 Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL

Hello Anita,

Following my email below earlier in the week I am periodically checking the Council's website and have seen the response from the Council's engineers and we are happy to accept a planning condition as advised to deal with the most appropriate surface water drainage scheme in due course – at the moment we are pretty confident the preferred strategy of soakaways can be achieved and this can be explored at a further date through appropriate testing etc.

Hope to engage with you when you are back at work next week.

Mark

From: Mark Cullen

Sent: 04 January 2022 14:43

To: 'Anita Gardner' <Anita.Gardner@arun.gov.uk>

Cc: Jamie Wilton <[REDACTED]> Jonathan Cooper' <[REDACTED]>; Sarah Hawkins <[REDACTED]> Philip Silk <[REDACTED]>

Subject: 95888 Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL

Importance: High

Hello Anita,

Happy New Year, I hope you had a great Christmas. I am now back as the main point of contact on this application. We have been monitoring the website and note the consultation responses received so far; a couple from local residents, Clymping Parish Council, the Fire Rescue Service and your Highways department.

Dealing with the 3 statutory responses in turn, we can offer the following comments which should assist you in your assessment, however, we do as per my colleagues email below feel it would be beneficial to have a call with you over the next week or so when you are back from leave and have received all responses to discuss any uncertainties further.

Dealing with each in turn so far:

- **Highways department** – we note 'no objection' from the highways officer and in normal practice welcome the condition for a Construction Management Plan;
- **Fire Rescue Service** – we note that the FRS Water and Access department flag two issues, both of which we can suitably address (proximity to a fire hydrant connection and accessibility by a fire engine). Conrad's proposed site is one of the most accessible flexible generation sites that they are progressing through planning at the moment. The width of the access road adjoining the site is over 10m as it was a former aircraft runway back in its day. Having reviewed the document that Mr Stocks refers us to, the minimum road should be 3.7m wide (see page 122). Furthermore, the same access is used by HGVs accessing the adjacent waste and recycling plant a stones throwaway to our site. The technical engineers at Conrad Energy have allowed suitable room to allow a crane to safely turn/operate within the site during construction and therefore access for a fire truck should be achievable. There will also be a water connection provided onsite. For completeness and to counteract any further discussions on this matter, Conrad energy will provide you with a swept path analysis drawing which will be sent to you shortly.
- **Clymping Parish Council** – From reading the Parish Council's response, it appears they may not have reviewed the Planning Statement submitted with the planning application (attached again for ease of reference). For the avoidance of doubt I can respond accordingly to their 4 points:
 - 1) *"the need is simply unproven"* – We strongly disagree with this point and refer you to paragraphs 4.16 to 4.24 of the planning statement. In a nutshell, the overarching National Statement for Energy (EN-1) sets out that the Government's policy for delivery of major energy infrastructure, and how it will meet goals on carbon emission reductions. It says, at paragraph 3.3.11, that an increase in renewable electricity is essential, but that some renewable sources are intermittent. As a result, it

recognises that, even when the UK's electricity supply is almost entirely decarbonised, fossil fuel power stations may still be necessary for short periods when renewable output is too low to meet demand. As a consequence, paragraph 3.3.12 says that an increased reliance on renewables will result in a need for more total electricity capacity, with a larger proportion being built only, or mainly, to perform back up functions. In addition to the above, Conrad Energy is more than happy to also give some more information of the need of the development from a grid perspective should you require it.

A landscape and visual appraisal was submitted to support the application. The Parish have referred to the application site as "open" countryside. The site was found to be well contained within the wider landscape due to the local topography and layers of intervening vegetation which frequently curtail views. The proposed development is unlikely to significantly alter the character of the wider area other than to change a corner of what is a small arable field adjacent to a waste recycling centre and other built form. Notwithstanding this landscape mitigation is being offered which seeks to make sure all existing trees and maturing vegetation to the western boundary of the site is maintained and protected. A landscape bund along the western edge of the site which will be supplemented by tree planting and species rich grassland will further soften the appearance of the energy compound and its boundary treatments from external viewpoints to the north-west of the site and the proposed planting will provide GI improvements that complement existing native hedgerows and trees and strengthen GI on site;

- **2) "The site is adjacent to residential developments and will add to noise and disturbance"** - details of noise emissions from the generators has been submitted as part of the planning application via a standalone noise impact assessment report. Ultimately this will be for the Councils EHO to assess but what we can say with certainty is that the proposed development will give rise to rating noise levels that are typically at or below the measured background sound level in the area. The results set out in Table 12 and 13 of the Noise Impact Assessment identify that the operation of the scheme, as proposed, can occur without affecting the amenity of the closest residential receptors to the site during the daytime. In addition to the bund and landscaping, an acoustic fence is also proposed along the western / north western boundary and eastern side of the development;
- **3) "the use of gas is not environmentally acceptable"** – It is clear from "top down" National Energy Policy and Statements that natural gas will continue to be required as a crucial part of the energy supply until at least 2050. A professional Air Quality Assessment has been undertaken by the applicants air quality specialists and dispersion modelling was undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the plant. These impacts at sensitive receptors were quantified and the results compared with the relevant EQS's and significance criteria. Predicted concentrations of all pollutants were below the relevant EQSs at all locations of human exposure for all meteorological data sets modelled. Furthermore, a review of the dispersion modelling results also indicated that impacts on annual mean NO2 concentrations were predicted to be negligible at all locations. There were no predicted 1-hour mean EQS exceedances at any location. As such, overall impacts are considered to be not significant.
- **4) "the development is out of proportion for a rural village"** – in summary I think bullet one above addresses this point but to add, the chosen location to site the proposals is driven by the pre-requisites listed in the site selection section of the planning statement (paragraphs 4.25-4.28). In this case the proposed siting is tucked away in the south west corner of the field which will be well screened. The application site will not be viewed as an isolated feature in the countryside as it is relatively close to the existing building group and former airfield directly to the south. In our view, careful siting and appropriate landscaping will mean that the much needed infrastructure is assimilated into the appearance of existing buildings, where no new internal road is required as the existing road and access arrangements will be utilised.

I hope that all helps for now and again, we welcome the opportunity to discuss the proposals in more detail should you feel this is necessary. If you could send through any other statutory responses you receive that would be greatly appreciated just in case we are required to provide any further information.

As an aside, please can I ask a procedure question – what are the triggers for a planning application needing to be heard at planning committee?

Thanks,
Mark

From: Sarah Hawkins <[REDACTED]>
Sent: 22 December 2021 12:20
To: 'Anita Gardner' <Anita.Gardner@arun.gov.uk>; Mark Cullen <[REDACTED]>
Cc: Jamie Wilton <[REDACTED]>
Subject: RE: Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL

Anita,

We are happy to agree the extension of time.

We would be grateful if we could set up a Teams call for early January – could you provide some suggested dates please?

Thanks, Sarah

SARAH HAWKINS MRTPI
Head of Planning/Partner

From: Sarah Hawkins
Sent: 22 December 2021 11:57
To: 'Anita Gardner' <Anita.Gardner@arun.gov.uk>; Mark Cullen <[REDACTED]>
Subject: RE: Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL

Anita,

We will speak with our client and come back to you.

Thanks, Sarah

From: Anita Gardner <Anita.Gardner@arun.gov.uk>
Sent: 22 December 2021 11:51
To: Mark Cullen <[REDACTED]>; Sarah Hawkins <[REDACTED]>
Subject: Land at Northwood Farm Flexible Generator Plant and associated infrastructure CM/69/21/PL

Dear Mr Cullen/Ms Hawkins,

The above application expires on 13-01-2022 and it is unlikely that the application report will be written before the offices close for Christmas on 24-12-2021 and some consultation responses are still awaited so I am writing to request an extension of time on the application. I am away the first week of January and would appreciate your agreement to an EOT of 1 month until 14-02-2022 to allow time for the responses to be considered and the officer report to be written and agreed by other officers. However a further EOT may be necessary if the application needs to be determined by Committee.

Please can you confirm your agreement by return?

Regards

Anita Gardner

Anita Gardner
Principal Planner

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