



GAS COMPOUND, TRECATTI LANDFILL SITE

**PLANNING APPLICATION FOR THE REPLACEMENT OF TWO
ELECTRICITY GENERATING ENGINES WITH TWO BATTERY
STORAGE UNITS**



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1.0 INTRODUCTION

This Planning Statement is part of a package of documents being submitted in support of a planning application in respect of land at the Gas Compound at Trecatti Landfill site.

Biffa have made a significant investment in energy infrastructure at the site to enable the utilisation of landfill gas to generate electricity and the infrastructure that has been installed is capable of supporting complimentary technologies which can maximise its existing capacity.

Planning permission for the compound was first obtained in the 1990's for the purposes of managing landfill gas and leachate gas to enable it to be beneficially used to create a "green" electrical energy for export to the national grid.

The decline in volumes of landfill gas generated by the landfill (which is a normal occurrence) means that the infrastructure can no longer be used to its full capacity, ultimately resulting in the removal of engines on a phased basis. However, there will be an on-going need to manage landfill gas at the site for perhaps decades to come. The site also benefits from an Environmental Permit, which manages potential emissions from the site.

Ultimately, replacing two of the existing gas engines with battery storage will ensure the full potential of the grid connection at the site is realised as landfill gas production, and electricity generation from that landfill gas, declines.

Battery storage technology has advanced significantly in recent years and is expected to play a key role in the UK's energy system ensuring the provision of a constant supply of electricity and levelling out peaks and troughs (see Section 6). Batteries can export electricity to meet demand when renewable sources such as wind and solar are under producing and can store energy from the grid when there is over production from these sources.

The UK has the largest installed capacity of offshore wind in the world, but the ability to capture this energy and purposefully deploy it can increase its value by increasing production and potentially reducing costs. Intelligent battery software uses algorithms to coordinate energy production and computerised control systems are used to decide when to keep the energy in reserve or release it to the grid. Energy is released from the battery storage system during times of peak demand, keeping costs down and electricity flowing.

This supporting statement includes a description of the application site, a brief planning history, consideration of relevant National and Local Planning Policy, discussion of the Government position on battery storage, a description of the proposed development, and an assessment of the potential environmental effects of the development.

1.1 The Applicant

Biffa is a sustainable leader in the UK's waste and recycling industry. Founded in London in 1912, we employ 10,000 people and collect waste from thousands of businesses and millions of households across the UK each day.

By growing our collections business, building our plastic recycling capacity, and investing in energy-from-waste, we're on a mission to enable the UK circular economy by changing the way businesses and people think about waste.

Our surplus food redistribution partnership with [Company Shop Group](#), and our environmental work with [BiffaAward](#) and [Waste Aid](#), also have wider benefits for the UK and beyond. Since 2002 we've reduced our carbon emissions by 70 per cent and aim to be net zero by 2050.

A great British brand, we're a member of the FTSE 250 and listed on the London Stock Exchange. To find out more visit biffa.co.uk or find us on [LinkedIn](#) and [Twitter](#).

1.2 The Site

The proposed development is within the existing Gas Compound at Trecatti Landfill site.

Trecatti Landfill is an existing active landfill located to the immediate north-east of Merthyr Tydfil and approximately 3km west of Rhymney (NGR SO 082 077) and is developed within a void created by historical, open-cast coal and ironstone mining. It currently comprises two areas of landfilling; the historic natural containment landfill to the north-east (the "Merthyr Waste Area"), and an area of artificially engineered containment landfilling to the west.

The site lies within an area of relatively elevated ground with the topography falling towards the west and east, towards the Taff and Rhymney valleys respectively. The site is immediately surrounded by common land, which includes vegetated colliery spoil tips and is used for rough grazing. The main surface water courses present in the vicinity of the site are the River Taff and Rhymney River, which flow in a general southerly direction, passing 3.5km to the west and 2.1km to the east of the site respectively. A number of tributary drains and streams drain the land immediately surrounding Trecatti Landfill.

Landfilling at Trecatti Landfill commenced within the Merthyr Waste Area in 1986 and in 1992 the management of the site transferred from Merthyr Tydfil Borough Council to Biffa.

The landfill gas management compound within the site is located on the eastern side of the main landfill area, south of the main access road as shown on Drawing No.1. The generation compound area is situated away from residential properties with the nearest approximately 0.75km away from the compound. The compound is bounded by an internal access road and the landfill to the west, and open agricultural land to the east.

The compound has been in place for many years with the original compound housing one flare and two generators. In 2004 planning consent was obtained for an extension to the compound area and a further flare and three generators were installed and in 2007 a further extension including a further two generators, a flare, gas clean-up equipment and a modular office. A further planning consent was granted in 2017 for the installation of gas storage tanks, gas conditioning unit, one compressed natural gas generating engine and two battery units to replace three former landfill gas electricity generating engines to provide short term operating reserve to the National Grid.

The boundary between Merthyr Tydfil County Borough Council and Caerphilly County Borough Council runs north to south across the landfill site with the landfill gas compound falling within Caerphilly County Borough Council. The compound is approximately 2500m² in area.

1.3 The Proposed Development

The principle of establishing battery units for the storage of electricity generated by the compound has already been established through the grant of planning permission 17/0860/FULL. This planning application seeks to utilise an alternative technology, however in all respects the outward appearance of the batteries would be almost identical to the Short Term Operating Reserves permitted by 17/0860/FULL and are considered acceptable. The existing generating engines convert landfill gas collected from the adjacent Trecatti landfill into electricity for export to grid. At maximum operation, each engine generates 1.25MW but as landfill gas production has declines, generation will also reduce.

To make best use of the grid connection at the site it is intended that once the current engines are no longer needed, they will be removed from site and replaced with a battery.

Once the gas engine becomes unviable to operate, then the containerised electricity engine will be replaced with a new container of similar dimensions that will house a large battery. The location of the engine that will be replaced is shown on drawing no. SF121300. The engines will only be removed and replaced with the battery container once the engine is no longer needed as part of the site landfill gas management system.

A battery is an electrochemical device, containing one or more electrochemical cells, which supplies electrical energy. A secondary (or rechargeable) battery (as proposed here) is a reversible device that converts electrochemical energy to electrical energy and vice versa.

The existing layout of the site and elevations are shown on drawing T3037700 and T3037900 respectively. The proposed layout and elevations are shown on drawing number T3037800 and T3038000 respectively.

The new containers will be the same size and will be similar in colour to the containers that have been previously approved by planning permission 17/0860/FULL and to those already on-site. The container will be dropped onto the concrete base vacated by the removed containers.

The new containerised batteries will be accessed via the existing site track that leads from the main access to the landfill facility into the gas compound.

The batteries will be operated remotely and will be available 24/7 but may only operate for a small number of hours per day. The battery will import or export electricity to the grid dependant on demands from the national grid. There will be infrequent visits for maintenance by small vans.

The proposals will not involve the extension of the footprint of the compound beyond its existing boundary. The appearance of the batteries would be the same as they are housed within the same acoustically treated ISO containers. The scale of the proposed development is in keeping with its surroundings (i.e. the existing Gas Compound).

The proposals do not involve extending the development footprint beyond the permitted boundary but simply replacing former generating engines with batteries. The appearance of the engines would be the same as they are housed within the same acoustically treated ISO containers and the only additional infrastructure would be the fuel storage tanks which would be positioned alongside the engines.

1.4 Existing Grid and Infrastructure

When Biffa installed the grid connection, all the equipment up to the metering circuit breaker from the main grid circuits was paid for by Biffa, as the operator of the generating station. Once it has been installed and commissioned, this equipment is adopted by the distribution network operator, and forms part of the local supply grid. The equipment “inside” the metering circuit breaker remains the property and responsibility of Biffa to maintain.

Apart from representing significant investment, and indirectly contributing to the security of electricity supply local to the site, the natural decline of landfill gas production leaves assets in the ground which will have little value unless used, and will result in duplication, and waste, if replaced elsewhere. To avoid wasting this valuable infrastructure, and unnecessary replacement it makes sense to try to reuse what already exists.

Existing connections have the benefit of proven use over time, and the longer the time period over which they can be used, the greater the sustainable benefits of the connection and project become.

1.5 Long Term Obligation to Manage Gas

When Biffa develop a site for landfill, there is a recognition that there will be a period of closure and aftercare leading up to the time that the site is completed, and chemical and biological activity has stabilised to the point that there is no longer the risk of environmental impact. The original post closure period was around 30 years, and this has recently been increased to circa 60 years across all Biffa locations.

As a responsible operator Biffa has obligations under planning and permitting to maintain the landfill site through a post closure aftercare phase, during which maintenance works are ongoing, landfill gas recovery continues, and leachate management is required. These activities require financial support, and as landfill gas projects become uneconomic the incomes to maintain infrastructure dwindle further. Operators therefore have to consider a wider range of options to fund their long term aftercare obligations, and the time variables that this introduces.

Having invested heavily in green energy, and with the site having infrastructure capable of supporting complimentary technologies, one option which contributes to financial support during the aftercare phase is to replace some of the declining landfill gas generation with a replacement fuel, using similar technologies to augment landfill gas generation.

The generation of landfill gas from a landfill is a result of the decomposing of the biodegradable fraction of the waste imported to the landfill. Typically, the volume of landfill gas generated, if plotted against time, would exhibit a ‘bell’ shape graph, with volume increasing to a peak and then falling away.

During this post closure or aftercare period there will come a point when landfill gas utilisation as a standalone activity will no longer be economically practicable (due to the decline in gas generation), and at this point the method of gas disposal would revert to extraction and flaring.

The landfill gas infrastructure, including wells, pipework, condensate pots, manifolds, gas boosters, and foundations (housed in a secure area) will however still be needed, until such time as the completion certificate for the site has been issued. Regular safety checks and quality control visits will still be required throughout this period, and system maintenance of the gas field will also be necessary.

There will be an ongoing obligation to visit and proactively repair the gas management infrastructure at the site whether the site is used for generation or not as the remaining volumes of landfill gas would be required to be flared.

2.0 BATTERIES

The use of batteries to support existing means of generation is becoming more widespread, with the installations being used for system balancing and frequency control.

Generation using landfill gas has historically relied on continuous and consistent extraction of gas from the landfill, and therefore results in a flat base load generation profile, whereas the demand pattern experienced across the UK is cyclic and has many peaks and troughs in demand.

To supply energy to consumers on an intermittent basis has historically been achieved by maintaining large generation plant operations at reduced loads, and by ramping loads up when demand occurs. This means that large equipment is operated when it is not required (as it is kept “spinning”) and operates inefficiently.

Battery storage allows energy to be stored in the short term, and discharged when demand occurs, reducing reliance on the larger stations being maintained in a continuous spinning condition. It has the added benefit of being able charge and discharge rapidly, assisting in the control of frequency over the grid. This second benefit again helps to improve overall efficiency, as consumer products are designed to operate at 50Hz, and the use of batteries to trim frequency produces a stable cycle.

The deployment of battery installations is aligned with Government energy policy and efficiency targets and has been actively encouraged through a number of schemes published by National Grid. OFGEM, the Government Energy Regulator, is also encouraging solutions of this type to add to the UK energy balancing mechanism, with efficiency playing a key part in reducing the cost to consumers.

3.0 ENVIRONMENTAL CONSIDERATIONS

3.1 Air Quality

The provision of the proposed replacement equipment and additional infrastructure would ensure that the facility continues to address environmental issues that are long-term and irreversible such as global warming through enabling the continuing provision of a comprehensive landfill gas utilisation system incorporating electricity generation rather than purely flaring landfill gas.

The continued management of landfill gas through its extraction from the former landfill site and resulting generation of electricity will continue to convert the methane contained in the landfill gas to carbon dioxide. Carbon dioxide is a considerably less potent greenhouse gas hence there is a positive environmental benefit to be gained by preventing the release of free methane to the atmosphere.

The batteries replace former landfill gas engines and as such there would be no additional emissions from the facility. There are no emissions from the battery units.

3.2 Noise

The main source of noise from the current engine is from the exhaust system. The compound is remote from residential properties and does not result in any noise disturbance outside or the site boundary. The proposed batteries will not include an exhaust. The only source of noise will be from a fan used to cool the battery when necessary. The noise from the fan will be much lower than that from the current engine exhaust and the potential for noise nuisance is negligible.

3.3 Landscape and Visual

The battery units are housed within ISO containers and are identical in appearance to the former landfill gas engines that they will replace with the exception that the battery units do not require an exhaust. The compound was previously approved within its setting with some additional landscaping provided at the time and it is considered to remain appropriate to continue to mitigate any visual impact from the compound. The electricity generating compound is already operational. The location is remote from property and is not visible from outside of the Studley site. The replacement of one containerised engine with one containerised battery will not result in any additional visual or landscape impact.

3.4 Water

To minimise the potential for the pollution of surface water and groundwater the compound is provided with a surface water drainage system. All drainage passes into the existing surface water drainage system for the landfill site via an interceptor. The surface water drainage from the landfill is regularly monitored as a requirement of the site Environmental Permit.

It is considered that the existing measures for the control of surface water drainage, the storage and disposal of lubricants and the disposal of condensate will continue to effectively minimise the potential for pollution of surface or groundwater from the existing development.

3.5 Access and Traffic

There would be no increase in traffic as a result of the proposed development. The current gas compound is monitored remotely and visits to the site are only made when maintenance is required, or the system notifies a fault. This will be the same when the engine is replaced with a battery. The system will operate remotely, and it will only be necessary to visit site occasionally and in a small van.

Construction traffic would be minimal as the compound is already developed and the proposed batteries arrive largely pre-assembled. HGV traffic would likely consist of a crane to lift the structures into place and approximately four flatbed trucks delivering the engines and ancillary equipment. Two light vans for engineers installing and commissioning the equipment over approximately two-week period.

4.0 PLANNING POLICY

4.1 Introduction

It is clear from published guidance that the Government is committed to a plan led system, with the Development Plan forming the basis of all planning decisions. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) confers a presumption in favour of development proposals which accord with the Development Plan unless material considerations indicate otherwise. Sub Section 5 of Section 38 also states that,

“if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be)”.

This principle has been developed and clarified by subsequent case law, which has confirmed that a particular proposal does not need to accord with each and every policy in a Development Plan; the key issue is that it accords with the overall thrust of Development Plan policies taken as a whole.

Accordingly, policy and plans play an important role in determining any planning application.

At the national level, the Planning (Wales) Act 2015 received Royal Assent in July 2015 and planning policy is set out in the Planning Policy Wales, together with the Technical Advice Notes (TANs). These address general principles and policies together with detailed guidance on waste management, and form a material consideration in the determination of a planning application.

4.2 The Development Plan

4.2.1 Legislative Background

The PCPA 2004 reformed the development plan system, replacing Local Plans with a requirement to produce a Local Development Framework (LDF). LDFs comprise a portfolio of Development Plan Documents (DPDs) and with the introduction of the Localism Act 2011, the Local Development Framework is replaced by Local Plans. The Planning (Wales) Act 2015 – principally amended the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 to introduce a number of reforms to strengthen the ‘plan-led’ approach to planning in Wales and improve the development management and enforcement systems.

Local Policy - Caerphilly Local Development Plan

The current Local Development Plan (LDP) was adopted on the 23 November 2010 and covers the period from 2006 to 2021.

Policy CW15 provides the general approach to locational constraints. It provides that development proposals will be considered against certain criteria; firstly that the proposals will not be permitted where they prejudice the implementation of wider comprehensive redevelopment or constrain the development of any adjacent site for its allocated use. The development is not considered to have any significant impact upon neighbouring land. Secondly, development outside of the settlement limits is restricted to a number of uses, including waste management.

4.3 National Policy

The Planning (Wales) Act 2015, Planning Policy Wales (PPW) and associated Technical Advice Notes (TANs) comprise the national planning policy for Wales, and set guidelines for the Development Plan at a local level. The principles of sustainable development and the development of a dynamic and advanced economy, both fundamental objectives of the Welsh Government, underlie all policies in PPW.

Technical Advice Note (Wales) 21: Waste 2014

TAN 21 aims to facilitate the introduction of a comprehensive, integrated and sustainable land use planning framework for waste management in Wales. TAN21 outlines the principles and techniques of waste management and the planning considerations for waste management facilities. The existing gas compound is essentially waste management infrastructure and the compound will continue to be necessary to manage landfill gas and as such waste planning policy continues to have relevance, however, there is now some spare capacity in the connection to the National Grid following removal of some landfill gas engines and this application effectively seeks to make use of that spare capacity through the utilisation of CNG powered engines and battery units to supplement the remaining landfill gas powered engines.

Planning Policy Wales

PPW sets out the land use planning policies of the Welsh Government. It is supplemented by a series of TANs. Procedural advice is given in circulars and policy clarification letters. PPW translates the Welsh Government's commitment to sustainable development into the planning system. As such it forms the basis for strategic and local decision making in the planning system in Wales. Paragraph 1.18 of the PPW states that legislation secures a *presumption in favour of sustainable development* in accordance with the development plan.

Central to PPW is the need to tackle climate change through, inter alia reducing greenhouse gas emissions which the existing landfill gas compound achieves. This is considered in Chapter 5 of PPW which addresses sustainability advocating *inter alia* providing necessary infrastructure for renewable and low carbon energy, stating at paragraph 5.9.1:

“Local authorities should facilitate all forms of renewable and low carbon energy development...In doing so, planning authorities should seek to ensure their areas full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved.”

It is therefore clear that these proposals are in full accordance with the PPW in this regard and should be planning permission should be issued for the development.

The PPW recognises that social, economic and environmental benefits can be realised from sustainable waste management and in particular, treating waste as a resource which the existing landfill gas compound will continue to do. At the same time, consideration is to be given when balancing these benefits to:

- minimising adverse environmental impacts and avoiding risks to human health;
- protecting areas of designated landscape and nature conservation from inappropriate development; and
- protecting the amenity of residents, of other land uses and users affected by existing or proposed waste management facilities.

These three issues have been firmly fixed in the design of the facility. The application site is not affected by any statutory designations for ecology, heritage or landscape. Similarly, there are no significant designations in the immediate vicinity of the application site. The application site is also remote from any settlements or individual properties; consideration has been given to the amenity of local communities.

For energy developments the government has also issued a National Policy Statement (NPS). The NPS's, issued by DECC, principally relate to Nationally Significant Projects *i.e.* energy facilities generating more than 50MW. The compound would generate well below the 50MW threshold. However, referring to paragraph 1.2.1 of EN-1 the general principles may also apply to lesser developments and is likely to be a material consideration in decision making for applications that fall under the Town and Country Planning Act 1990. The policy set out in the NPS is for the most part intended to make existing policy and practice clearer and more transparent, rather than to change the underlying policies against which applications are assessed.

The proposals are therefore considered to accord with the policies of the Development Plan in that the scale of development, its siting, design, landscaping, the materials and colours of the equipment used have previously been deemed appropriate for its setting.

4.3.1 National Policy Statement EN-1

The relevant national policy is provided by the overarching National Policy Statement (NPS) for Energy (EN-1) published in 2011.

Paragraph 2.2.20 of EN-1 is concerned with national security of energy supply and states:

“It is critical that the UK continues to have secure and reliable supplies of electricity as we make the transition to a low carbon economy. To manage the risks to achieving security of supply we need sufficient electricity capacity (including a greater proportion of low carbon generation) to meet demand at all times. Electricity cannot be stored so demand for it must be simultaneously and continuously met by its supply. This requires a safety margin of spare capacity to accommodate unforeseen fluctuations in supply or demand.”

Whilst the policy includes a shift towards low carbon generation, it has to be acknowledged that the contribution of renewable technologies, in particular solar and wind, is weather dependent and therefore unpredictable.

Paragraph 3.3.3 of the statement points out:

“The larger the difference between available capacity and demand (i.e. the larger the safety margin), the more resilient the system will be in dealing with unexpected events, and consequently the lower the risk of a supply interruption. This helps to protect businesses and consumers, including vulnerable households, from rising and volatile prices and, eventually, from physical interruptions to supplies that might impact on essential services.”

The proposed development conforms to national energy policy and will support a more resilient energy system that should deal with the unpredictable nature of some renewables ensuring security of supply.

The Energy Act 2013 is the primary legislation that enables Electricity Market Reform (EMR), including the implementation of the Capacity Market (CM). The delivery of EMR is a key Government objective to secure energy supply on the way to a sustainable low carbon future.

The government has established the CM with the intention of incentivising investment in more sustainable, low-carbon electricity capacity at the least cost for energy consumers. These principles are embodied in the Green Paper “Building Our Industrial Strategy” (January 2017).

In June 2016, the Energy and Climate Change Committee published their Low Carbon Network Infrastructure Report. This recommended the rapid roll-out of battery storage in order to support the development of a low carbon economy. The purpose of battery storage, such as that proposed here is to contribute to this national programme providing cost effective, flexible energy during peak electricity periods. It will also provide local energy security as, unlike national energy generation, it will feed electricity into the local electricity network at the point of need.

Building storage capacity together with smart use of transmission and distribution systems are therefore now a priority for UK Government. Westminster’s Modern Industrial Strategy published in December 2017 puts energy efficiency and storage at its heart, seeing new technological development key to the country’s ambitions in global markets.

In July 2020 the Government announced it was to relax planning legislation to make it easier to construct large batteries to store renewable energy. As part of the announcement Government acknowledged that flexible technologies, like batteries, will form part of the UK’s smarter electricity grid, supporting the integration of more low-carbon power, heat, and transport technologies, which it is estimated could save the UK energy system up to £40 billion by 2050

Electricity storage is already being deployed across the UK and in July 2020 the Government estimated approximately 4GW of storage was in the planning system. National Grid’s 2021 Future Energy Scenarios (FES) predicts that by 2030 as much as 13GW of new electricity storage could be required to help balance periods of high and low renewable output.

The Government has a challenging and critical set of objectives in the energy sector: ensuring security of energy supply, keeping bills as low as possible for households and businesses, and decarbonising cost effectively and in a way that enables us to reap the economic benefits of this transition. As part of this, the Government’s Clean Growth Strategy sets out a suite of policies to decarbonise the economy, of which smart energy is a key element. The proposed development will contribute, albeit in a small way, to achieving the Government’s objectives.

4.3.2 Other Material Considerations

The White Paper “Meeting the Energy Challenge”

This White Paper, published in May 2007, sets out the Government’s international and domestic energy strategy. It pre-dates the NPS EN-1 and many of its threads have found their way into the more recent policy document.

It, addresses the long-term energy challenges the UK faces and delivers energy policy goals of cutting carbon dioxide emissions, maintaining reliability of supply, promoting competitive markets and ensuring every home is adequately and affordably heated.

The strategy comments that to deliver energy security and accelerate the transition to a low carbon economy requires urgent and ambitious action by

- save energy;
- develop cleaner energy supplies; and
- secure reliable energy supplies at prices set in competitive markets.

Like the NPS EN-1, it recognises that the UK cannot rely on renewables alone to provide the nation's energy needs; a diverse energy mix is needed, again noting the intermittent nature of wind power for example. The White Paper states:

"We will continue to need fossil fuels as part of a diverse energy mix for some time to come. But in order to meet our carbon reduction goals, sources such as coal and gas must become cleaner".

5.0 CONCLUSIONS

Biffa is applying for planning permission to replace one electricity generating engine with a containerised battery when conditions are suitable at the Trecatti Landfill site. The principle of establishing battery units for the storage of electricity generated by the compound has already been established through the grant of planning permission 17/0860/FULL. This planning application seeks to utilise an alternative technology, however in all respects the outward appearance of the batteries would be almost identical to the Short Term Operating Reserves permitted by 17/0860/FULL and are considered acceptable

The use of batteries to support existing generation is becoming more widespread, with the installations being used for system balancing and frequency control. Generation using landfill gas has historically relied on continuous and consistent extraction of gas from the landfill, and therefore results in a flat base load generation profile, whereas the demand pattern experienced across the UK is cyclic, and has many peaks and troughs in demand.

Battery storage allows energy to be stored in the short term, and discharged when demand occurs, reducing reliance on the larger stations being maintained in a continuous spinning condition. It has the added benefit of being able charge and discharge rapidly, assisting in the control of frequency over the grid. This second benefit again helps to improve overall efficiency, as consumer products are designed to operate at 50Hz, and the use of batteries to trim frequency produces a stable cycle.

The deployment of battery installations is aligned with Government energy policy and efficiency targets, and has been actively encouraged through a number of schemes published by National Grid. OFGEM, the Government Energy Regulator, is also encouraging solutions of this type to add to the UK energy balancing mechanism, with efficiency playing a key part in reducing the cost to consumers.

The proposed development has been demonstrated to accord with relevant national and local policies on energy and planning.

There would be no unacceptable adverse environmental effects as a result of the proposed development and I would therefore be grateful that planning permission is granted.

