Planning, Design and Access Statement

Shaneragh Battery Energy Storage Facility

Applicant	Renewable Energy Systems Limited
Date	December 2024
Internal Ref	05577-7670923

Contents

1 Introduction

1.1 The Application

Renewable Energy Systems Limited (RES) ("the Applicant") has prepared this Planning Statement, in support of a full planning application to Fermanagh and Omagh District Council for an Energy Storage Facility (ESF) ("the Proposed Development") on land at 320m South West of 22 Skreen Road, Dromore.

This statement outlines the context of the application site and surrounding area, and the need for the proposed development, including an assessment of how it accords with relevant national, regional and local planning policies as well as material considerations. It is supported by a number of drawings, technical documents and survey reports, a schedule of which has been included in Appendix A.

1.2 The Applicant

1.2.1 RES Group Experience

RES is the world's largest independent renewable energy company with 40 years' experience developing, constructing and operating renewable energy assets. RES has delivered more than 21GW of renewable energy projects across the globe and supports an operational asset portfolio of over 7GW worldwide for a large client base all under long term contracts.

The Group's head office in Kings Langley, near London, is complemented by other offices across the UK including Glasgow, Gateshead, Truro, Cardiff and Larne. Internationally, RES has overseas subsidiary offices in France, Scandinavia, Australia, New Zealand, Canada, Turkey, Germany, and across the USA. The RES Group employs 4,500 staff. RES is a privately-owned company that grew out of the Sir Robert McAlpine group, a family-owned firm with over 130 years of experience in the construction and engineering sector. RES has strong in-house engineering and technical capability and operates in five main technology areas: on/offshore wind, solar, storage, green hydrogen and transmission & distribution.

1.2.2 RES Battery Energy Storage Systems Experience

Globally, RES is an industry leader in the delivery and operation of energy storage projects having developed and/or constructed over 2GW of projects across the globe. RES also provides full asset management and operations and maintenance services worldwide including on over 500MW of assets in the UK and Ireland. RES has been named number 4 globally in energy storage integration by Navigant Research in 2019. RES has multiple professionals dedicated to energy storage and many others supporting across technologies, including in-house capability across all the following functions:

- Energy storage engineering and design
- Control systems (our RESolve platform)
- Procurement
- Construction/delivery
- Asset management and operations

RES's first battery storage facility in the UK was in 2016 and consisted of the 330kW Copley Wood Project. This was designed, constructed and operated by RES for Western Power Distribution and was integrated

into the existing solar farm infrastructure. In 2018, RES successfully handed over the Broxburn Battery Storage facility (20MW), the Port of Tyne Battery Storage facility (35MW) and Tynemouth Battery Storage facility (25MW) which RES designed and constructed using Samsung batteries and SMA inverters with associated civil and electrical works. RES has been retained as both the Asset Manager and O&M service provider for the projects which has been successfully delivering frequency response services to National Grid since 2018.

More recently, between 2020-2024, RES has successfully developed, consented and secured investment for over 400MW of energy storage projects across the UK and Ireland. In recent years, RES also successfully completed the development, construction and connection of a combined 75MW in ROI with Gorey Battery Energy Storage, Avonbeg BESS and Gorman Energy Storage Station. Following construction of the RES-developed 100MW Lakeside project in Yorkshire, RES have also recently taken on full asset management services for the project which is s now the largest transmission-connected BESS project in the UK.

2 The Proposal

2.1 Site Description

The site is located within two existing adjacent agricultural fields, currently used for cattle grazing, and covers an area of approximately 8ha. The site is located approximately 500m North-west of Dromore substation but approximately 4.5km north-east from the settlement of Dromore itself.

The site has an undulating landform with the lands falling towards the north-western corner of the site. The site is currently bounded on all boundaries by post and wiring fencing with sporadic hedging along such, with the northern boundary being defined by a line of mature trees. The site is accessed via an existing agricultural access directly off the Skreen Road; improvements will be done to this laneway where necessary. There is an electricity line running on the southern half of the site.

Outside of the site boundary, the landscape includes the Dromore Electrical Substation complex, 2 standalone wind turbines and surrounding agricultural lands.

The site is easily accessible from the Clanabogan Road, the main road between Omagh and Dromore. From this road, vehicles will take the Cavan Road for approximately 2km before turning onto the Skreen Road for 0.7km to the site. It is noted that Dromore Substation is accessed off the Cavan Road.

2.2 Development Description

The proposed development comprises the installation of a Battery Energy Storage System (BESS), DNO substation building, control building, auxiliary transformer, grid compliance equipment, CCTV & lighting columns, security fencing, ancillary works, access track, entrance upgrades, hardstanding, widening along the Skreen Road and associated works.

The proposed system utilises proven lithium-ion battery technology which RES has deployed at multiple projects at locations including England, Scotland, Ireland, the USA and Canada.

2.2.1 Amount, Scale and Appearance

Battery Containers

Approximately 116 battery storage enclosures would be installed to provide up to a 100MW of capacity. The battery enclosures will be one of two types depending on the final choice of supplier, both of which are shown in drawing 05577-RES-LAY-DR-PE-001. The first type are simply modified ISO-style shipping containers set on concrete foundations, with typical dimensions of 13.7m long, 2.4m wide and 2.9m high. Heating Ventilation & Air Conditioning (HVAC) units are located at each end of each container. The containers are generally finished in a shade of white or grey.

The second type are modular battery containers, also set on concrete foundations, which are ‘packed’ together to form similar dimensions to that of the container mentioned above. These modular battery storage enclosures have a white finish.

Power Conversation Systems and Transformers

Approximately 29 PCSs and transformers would be required with typical dimensions of 10.3m long, 6m wide and 2.5m high (see drawing 05577-RES-PCS-DR-PT-001). They would also be set on concrete block foundations and would be finished in a shade of white or grey.

Substations

Two containerised substation units would be required. Located adjacent to each other, these would measure a maximum of 17.5m long in total, 5m wide and 4.5m high (see drawing 05577-RES-SUB-DR-PT-001). The units would be set on a concrete foundation..

Auxiliary Transformer

An auxiliary transformer with typical dimensions of 1.9m long, 1.9m wide and 2.1m high would be installed adjacent to the energy storage containers (see drawing 05577-RES-SUB-DR-PT-003). This would be set on concrete foundations.

Grid Compliance Equipment

It is expected that two grid compliance equipment units will be required. They will measure up to approximately 4m long, 2.8m wide and 2.7m high (see drawing 05577-RES-SUB-DR-PT-002). They will each be set on a concrete foundation up to approximately 4.3m long and 3.1m wide.

Spares Container

One additional ISO-style shipping container will be located adjacent to the battery enclosures with typical dimensions of 13.7m long, 2.4m wide and 2.9m high. It would be finished in a shade of white, grey or green.

Security

Stands for CCTV cameras will be installed on site. The CCTV cameras are mounted on galvanised steel posts (or similar) measuring up to approximately 4m high and set in concrete foundations. The cameras may have pan, tilt and zoom functions. They will be located adjacent to the security fencing around the edge of the energy storage compound (see drawing 05577-RES-LAY-DR-PE-001).

Security fencing will be installed around all four edges of the energy storage compound. Following acoustic analysis of the proposed system, this fencing will be closed board wooden acoustic fencing up to 3m in height (see drawing 05577-RES-SEC-DR-PT-002).

Proposed lighting for the development is for the purpose of safe access around site during hours of darkness only. Lighting will comprise manually switched or PIR (with photocell) operated lights, mounted on buildings / equipment and lighting columns, which will only be activated when personnel are on site. Usage of the lighting is therefore anticipated to be minimal, since normal site attendance would be during daylight hours.

Grid Connection

Cabling will connect all equipment within the energy storage compound to the on-site customer substation. An additional run of underground cable(s) will then connect the on-site customer substation to the existing Dromore Electrical substation located toward the west of the site. This latter run of cable does not form part of this planning application.

Drainage

A Sustainable Drainage System (SUDS) will be utilised to manage on-site surface water run-off. The proposed water attenuation pond, located to the north-west of the energy storage compound, and associated drainage route are shown on the infrastructure layout drawing (05577-RES-LAY-DR-PT-001). Further details are provided in Section 5.5 of this document and in the supporting Flood Risk Screening and Drainage Management Plan.

2.2.2 Layout

The proposed layout of the site is shown in the Infrastructure Layout Plan (05577-RES-LAY-DR-PT-001). The layout has been guided by a number of factors, but primarily by the operational requirements of an energy storage facility combined with site constraints.

The battery storage enclosures and associated PCS and transformer units have been sited in close parallel rows to reduce the amount of cabling required between each unit and to condense the area required for the overall development. Space between the equipment on site and surrounding fence has also been left in order to provide sufficient space for a crane during construction and in case of repair and augmentation.

The attenuation basin has been located to the north-west of the BESS compound, at the lowest point, in order to utilise the existing topography of the land to assist with drainage of the site.

2.2.3 Access

Access to the site will via two access points, one in which is existing and one proposed. The existing access will be upgraded where necessary to bring it to standard, with the laneway being widened but splays are already insitu. The northern access has been identified as the primary access. The site will access off the Skreen Road directly off the Cavan Road, with minor widening works to Skreen Road to accommodate construction vehicles. Once on the Skreen Road, the site is accessed via a private laneway to the field in which the is located within. Once inside the site, a short access track will be constructed, usually of compacted stone, leading from the site entrance to the gated storage compound area.

2.2.4 Landscaping

A landscaping plan has been submitted (see 'Detailed Landscaping Proposal' plan) which takes account of the identified areas of sensitivity by providing additional planting where required and maintenance notes for the proposed planting. Care has been taken to utilise species which will help to encourage biodiversity within the site, with a focus of including fruit bearing species to provide foraging and nesting habitat for birds and other protected species, such as badgers.

The landscaping proposals include the following:

- Creation of new native tree and woodland planting along the existing laneway to south east of the compound to add visual enclosure.
- Retention of existing areas of vegetation and trees with the Provision of new native tree lined hedgerow planting along the boundaries.
- Enhancement of other areas surrounding the compound through proposed seeding areas.
- Ongoing landscape management of planting during the lifetime of the proposed development.

2.3 Site Selection

Energy storage projects require certain conditions in order to be feasible. The requirements are listed here as well as a short explanation of how they shaped the selection and design of this site.

Viable grid connection: An energy storage facility needs to be able to both import and export energy to the grid network. Due to the issues facing the grid network (discussed in Section 3 below), the availability of sites where the required amount of import and export capacity is available is diminishing.

The existing electrical substation at Dromore has a viable amount of both import and export capacity available which RES will seek to secure for this project. Identifying a substation which can provide a viable grid connection was the first step to selecting this site.

Proximity to substation: Energy storage facilities need to be located as close as possible to the substation from which its grid connection is provided in order to limit electrical losses and ensure greater efficiency of the system. The distance between potential energy storage sites and the nearest suitable grid connection is often a major barrier to the deployment of renewable and low carbon energy due to the high costs involved. The longer the distance, the higher the cost, rendering many projects unviable.

Identifying land as close as possible to the Dromore electrical substation was therefore the second step in selecting this particular site. This is a key factor in the choice of location for the proposed development.

Availability of land: An energy storage facility of this capacity requires an area of land of at least 5 acres to accommodate the batteries and supporting electrical infrastructure. Land of this size, as close to the substation as possible, which is free from other development and obtainable from a third-party landowner is required. Additional space for drainage, landscaping and access is also required.

Land around the Dromore substation was therefore assessed with regard to its size and availability. The selected site provides ample space for a storage development of this size and is free from any other forms of current or future development.

Environmental and policy constraints: Energy storage facilities, where possible, should avoid being sited on land which are designated for landscape, heritage, ecological or other environmental reasons, or on land where development is restricted by local planning policy.

This particular site has been chosen as it is not located within any statutory designated areas and there is a sufficient separation distance from any of these areas to ensure that they will have no impact on such.

The site is also located within undesignated agricultural lands, given the development approved in the immediate vicinity it is felt that this will not alter the character of the area nor have an adverse effect on any environmental or historical assets.

Other considerations: When a site with all the previous factors considered has been identified, several other environmental and technical constraints must be assessed. These include, but are not limited to:

- Proximity to existing overhead lines and underground utilities
- Ground conditions
- Distance to nearest residential properties
- The existence of any protected species

- The flood risk status of the site
- Ease of access

This specific site has therefore undergone rigorous assessment to ensure that it is suitable to accommodate the development of an energy storage facility. Given the unique locational advantage of the site, in close proximity to an existing electrical substation with an available grid connection, and lack of sensitive receptors in the immediate vicinity, the site is therefore considered particularly suitable for this type of development.

2.4 Need for the Development

2.4.1 Overview

Energy storage systems (ESS) have been identified as an effective method for storing energy in moments of oversupply and releasing energy back into the grid during times of high demand. As well as this, energy storage systems are used to maintain grid frequency within normal operating limits. In Northern Ireland, the existing Battery Energy Storage Systems (BESS) such as Castlereagh Storage Unit, Kells Battery Storage and Kilroot Battery already enhance the grid significantly. However, more battery installations are required as part of grid modernization efforts.

2.4.2 Advantages

Unlike conventional power stations, which can only supply power, energy storage systems can both supply and store power for use when it is needed, effectively doubling their resource value to the grid. Batteries can provide power in less than one second and can be rapidly deployed, unlike large, centralised power stations, which take years to plan, develop, and construct.

2.4.3 Emissions Reduction

Conventional power stations often serve as peaking plants or provide grid support services. These functions can be replaced by energy storage projects, significantly reducing carbon dioxide emissions. Energy storage systems the integration of additional renewable energy generation, which might not have been possible otherwise. Thus, energy storage enhances the ability to harness renewable energy resources, making them a larger part of the energy mix. Although there is significant potential to deploy more renewable assets in Northern Ireland, grid capacity constraints exist. Energy storage is crucial for unlocking renewable capacity and improving the environmental sustainability of electricity production.

2.4.4 Economic Benefits

Experience across the EU shows that battery storage can provide grid system services at a lower cost than traditional power stations. Energy storage reduces the cost of essential grid services and physical infrastructure, leading to cost savings for energy users and a more competitive and resilient economy. The existing transmission network is designed to transfer power from large power stations, and the overhead line network has developed accordingly. Locating a BESS near Dromore substation reduces the need for new overhead lines, which are often unpopular and expensive. This represents a significant financial saving and avoids the environmental impacts associated with new overhead lines.

2.4.5 Security of Supply

Energy Storage Systems reduce reliance on large, centralised power stations, enhancing resilience to severe local events that could impact a large power generator station. BESS facilities support the development of more indigenous renewable energy assets, reducing dependence on imported fossil fuels and positively impacting security of supply.

Energy Storage Systems will play a crucial role in providing a secure and sustainable electricity system in Northern Ireland now and in the future. These systems must be developed at strategic locations within the existing infrastructure.

Energy storage is an essential new element in the electricity network. It will be a key part of ongoing grid modernisation, accommodating intermittent renewable energy sources and the need for a more efficient network. The proposed site is strategically placed to give benefit to the existing electricity network, making it both necessary and optimal.

3 Screening & Pre-Application Consultation

Prior to the submission of this application, conversations with Fermanagh and Omagh District Council, via a Pre-Application Discussion application which was submitted on 22nd April 2024. During this process, a number of key points, relevant policies and potential issues were discussed which informed the progression of the development. From such, a Section 26 application was submitted on 28th August 2024 to the Council, however, this application was returned as invalid on the 29th August 2024 for the reason;

> *"Proposal does not meet a threshold of development prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011."*

However, as this application does fall under that classified as a major development there is a requirement for any pre-application consultation. As the site falls under Category 9 of The Planning (Development Management) Regulations (Northern Ireland) 2015 and exceeds 1 hectare in size it is classified as a major development. A full Pre-Application Community Consultation Report accompanies this application.

A review of The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 regulations was undertaken and accompanies this application. An initial EIA screening was carried out and concluded that this type of development does not fall within any development defined under Schedule 1 or 2 in The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017. As such an EIA or environmental statement is not required as this time.

4 Planning Policy Appraisal

4.1 Planning Considerations

4.1.1 Planning Act Northern Ireland 2011

Section 45(1) of the Planning Act (NI) 2011 requires in dealing with an application, to have regard to the local development Plan (LDP), so far as material to the application, and to any other material considerations. Section 6(4) requires that the determination of proposals must be in accordance with the LDP unless material considerations indicate otherwise.

4.1.2. Omagh Area Plan 1987 – 2002

On 16 March 2023, the Council adopted the Fermanagh and Omagh District Council Local Development Plan 2030 - Plan Strategy. In line with the transitional arrangements as set out in the Schedule to the Local Development Plan Regulations 2015 (as amended) the Local Development Plan now becomes a combination of the Departmental Development Plan (DDP) and the Plan Strategy (PS) read together. In this application the Omagh Area Plan is the relevant DDP. In accordance with the legislation any conflict between a policy contained in the DDP and those of the Plan Strategy must be resolved in favour of the Plan Strategy.

4.1.3 Fermanagh and Omagh Local Development Plan 2030 – Plan Strategy

Fermanagh and Omagh District adopted the Local Development Plan 2030 – Plan Strategy (PS) on 16 March 2023. The PS provides a plan-led policy framework for making day-to-day decisions to help the Council deliver sustainable development.

The PS identifies that the proposed development site is located within the countryside. It is not, however, located within a specifically designated area, e.g. environmental constraint or Area of Outstanding Natural Beauty (AONB). The PS includes a Landscape Wind Energy Strategy (LWES) with associated mapping and within that the proposed development site is located in an Area with Limited Underlying Capacity for wind energy and an Area of Significant Cumulative Development (wind energy). Neither of these designations are directly applicable to the consideration of the proposed development, however the LWES also notes that the site is located within Landscape Character Type (LCT) 'Lowland Farmland', and Landscape Character Area (LCA) 22 'Omagh Farmland'. In terms of underlying landscape capacity the PS notes that this area has a medium capacity to accommodate future wind energy development of 50m (height) or less. Again, whilst the study is not directly related to the type of development proposed, it is useful as a means of understanding the surrounding landscape and its ability to facilitate new forms of development.

With specific regard to Battery Energy Storage there is very little within the PS which provides direct/applicable policy provision. There is a section within the PS on Public Utilities and Energy infrastructure and the justification text of that establishes the Council's position on new public utility development:

"To underpin economic growth, it is also necessary to have a safe, secure, reliable energy infrastructure network. New energy infrastructure must be carefully planned and assessed to avoid adverse environmental

effects, particularly on or near protected sites and areas of landscape sensitivity including the Sperrin AONB."

In addition to the above, the PS LWES also includes a design guide for wind energy development, which includes a small, but applicable, reference to battery storage:

"battery storage should be carefully sited and should generally avoid high, exposed locations where they may be incongruous."

4.1.4 A Planning Strategy for Rural Northern Ireland (PSRNI)

The planning policy provision contained within the PSRNI has largely been replaced and superseded by the various suite of PPS documents, the SPPS and the provisions contained within more specific Local Development Plan Policy, however some planning policy prevails and remains the existing published planning policy. Once such policy is Policy PSU 8 of PSRNI. Whilst the policy provision contained within PSU 8 has been superseded, where it relates to wastewater and treatment works, it remains applicable where it relates to new infrastructure projects such as that proposed under this planning application.

In the consideration of proposals for new infrastructure, the need for the facility will be balanced against the objective of conserving the environment and protecting amenity.

Policy PSU 8 recognises that development 'such as new roads, treatment works, water sources, or electricity generation can be of vital importance, not only to industry and commerce, but to the quality of life of society as a whole'. In dealing with these applications, Council's should satisfy themselves of the regional/local need for the proposal and the suitability (or otherwise) of alternative sites nearby. Development proposals should be sited so as to minimise the environmental effects, and the following criteria will be applied in the consideration of such applications:

- Need for the facility
- Impact on the environment, in particular visual and ecological
- Impact on existing communities
- Impact on natural or man-made heritage
- Existence of alternative sites/routes, and
- Provision to mitigate adverse effects

4.1.5 Regional Development Strategy (RDS) 2035

The Regional Development Strategy (2035) for Northern Ireland serves as a strategic planning framework to facilitate and guide both public and private sectors, and is integral to decisions on individual planning applications. The RDS states the following:

"Transport, agriculture and energy supply are the main contributors to greenhouse gas emissions…… Climate change is widely accepted as a major environmental threat with increases to annual rainfall and average temperatures potentially impacting on species and habitats."

The RDS outlines two types of Strategic Guidance;

- **Regional Guidance (RG)** - This applies to everywhere in the region and is presented under the 3 sustainable development themes of Economy, Society and Environment.
- **Spatial Framework Guidance (SFG)** - This is additional to the region-wide guidance and is tailored to each of the 5 elements of the Spatial Framework.

The Regional Guidance sections are broken down into 12 subheadings which are all captured under the headings Economy, Society and Environment. Three of these twelve RGs seem particularly relevant to this proposal:

RG5 - Deliver a sustainable and secure energy supply.

"Northern Ireland needs a robust and sustainable energy infrastructure. This should deliver reliable and secure sources of energy to communities and businesses across the region. New generation or distribution infrastructure must be carefully planned and assessed to avoid adverse environmental effects..... Decision makers will have to balance impacts against the benefits from a secure renewable energy stream, and the potential for cleaner air and energy for industry and transportation."

RG5 also outlines 5 key points, 4 of which are relevant to this proposal and outlined below:

- "Increase the contribution that renewable energy can make to the overall energy mix - There will need to be a significant increase in all types of renewable electricity installations and renewable heat installations, including a wide range of renewable resources for electricity generation both onshore and offshore to meet the Regions needs."
- "Strengthen the grid - With an increasing number of renewable electricity installations as well as increasing numbers of renewable heat installations we will need to strengthen the grid. It will be necessary to integrate heat and electricity infrastructure (e.g. district heating networks and new electricity grid) alongside new road infrastructure development at the planning stage. If electric transport becomes more widespread, there will need to be a reliable recharging network. It also means increasing electricity interconnection capacity to strengthen the linkages between transmission and distribution networks"
- "Work with neighbours - This will ensure a secure energy supply from competitive regional electricity and gas markets in the EU's Internal Market"
- "Develop "Smart Grid" Initiatives - This will improve the responsiveness of the electricity grid to facilitate new forms of renewable generation, to improve reliability, productivity, and energy efficiency and empower customers to make a more informed choice in relation to their energy usage."

The proposed battery energy storage development would help in all of these key points. By storing energy at times of oversupply and dispatching energy to the grid in times of high demand, it can help facilitate an increase in energy contribution from renewable sources on the grid. The battery storage system would allow

for better management of the grid and generally add to the network's robustness and strength during times of high constraint. Battery systems can help with the various challenges faced in managing power flows, allowing efficient operation of the power system through frequency response services, energy arbitrage and other essential services to manage power system operations. Overall, the proposal would serve to improve the electrical network in Northern Ireland and make for more efficient, stable and smart use of energy generation.

RG9 - Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality.

"Climate change is increasingly seen as one of the most serious problems facing the world. Air pollution from particulate matter is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months…….it is important that Northern Ireland plays its part by reducing air pollution and greenhouse gas emissions and preparing for the impacts of climate change. These include the effects on species and habitats and on health as a result of warmer temperatures, storms, floods and coastal erosion."

"Consideration needs to be given on how to reduce energy consumption and the move to more sustainable methods of energy production. The use of fossil fuels and greenhouse gas emissions can be reduced by recycling waste and recovering energy from it"

RG9 outlines several mitigation aims, several of which are relevant to this development:

- Increase the use of renewable energies.
- Utilise local production of heat and/or electricity from low or zero carbon energy sources.
- Develop strong linkages between policies for managing air pollution and climate change.
- Protect Air Quality Management Areas.

The proposed development would help to achieve all of these mitigation aims. The battery system would allow for more efficient use of renewable energy sources on the system and in turn help to reduce pollution, carbon footprint and the impacts of climate change.

RG9 also outlines adaption aims, one of which is particularly relevant to this development:

- Protect and extend the ecosystems and habitats that can reduce or buffer the effects of climate change.

RG11 - Conserve, protect and, where possible, enhance our built heritage and our natural environment.

The technical assessments outlined in section 5 of this statement summarise how the proposed development will have a minimal impact to the heritage of the area and will have a net benefit to biodiversity.

4.2 Policies

4.2.1 Strategic Planning Policy Statement

The Strategic Planning Policy Statement was first published in 2015, which is a statement on behalf of the Department and their policies on planning matters that should be addressed across Northern Ireland until all local Councils adopt their own Local Development Plan.

The provisions of the SPPS are material to all planning applications and decisions, wherein it has consolidated the previous policy publications and has set out a strategic policies on a wide array of policy matters all in line with RDS. The SPPS retains policies within existing Planning Policy Statements until such times a Plan Strategy for each Council has been adopted. It has set out transitional arrangements in the event of conflicting policy, which must be resolved in favour of the SPPS.

The SPPS seeks to "*facilitate the development of infrastructure*", such as this Battery Storage System in an efficient and effective manner provided the environmental impacts are kept to a minimum. A number of environmental and technical reports have been submitted to demonstrate that the development will not produce any significant environmental impacts, and therefore does not conflict with the SPPS. The SPPS requires that social, environmental and economic benefits are taken into consideration for all proposals. The SPPS states that "*the planning system should positively and proactively facilitate development that contributes to a more socially and environmentally sustainable Northern Ireland*".

In accordance with paragraph 1.9 of the Strategic Planning Policy Statement (SPPS), as the Council has adopted its Plan Strategy, existing policy retained under the transitional arrangements have ceased to have effect in the Council District and shall not be material from that date (16 March), whether the planning application has been received before or after that date.

The Plan Strategy provides a plan-led policy framework for making day-to-day decisions to help the Council deliver sustainable development including future housing, employment, retail and infrastructure provision across the district.

4.2.2 Fermanagh and Omagh Local Development Plan 2030 – Plan Strategy

DE01 – General Amenity Requirements

Within this policy it states that the Council will not support development proposals if they have a negative impact on residential amenity of nearby properties and receptors. In addition, it would not support proposals that do not protect visual amenity in the public interest, and refers to that development will not be accepted if creates issues of;

- Overlooking and/or loss of privacy;
- Dominance or overshadowing;
- Odour, noise, vibration or other forms of disturbance;
- Forms of pollution; and
- General disturbance

The proposed development of Shaneragh has been situated sufficient distance from residential properties to ensure that it will not result in an adverse impact on residential amenity or be visually intrusive. Given the nature and location of the development, as well as its small scale, the proposed development will not result in any form of overshadowing or dominance. The supporting Acoustic Assessment also concludes that the proposal will not result in any adverse disturbance from noise or vibration. The site has been designed to ensure that there is a minimal to no risk of pollution, and there is no risk of odour from this form of development. Overall it is considered that the development will not create an adverse disturbance.

DE02 – Design Quality

This part of the strategy relates to the Council supporting development of a high quality built environment. The Shaneragh proposal is a typical design and layout of BESS development that intends to add biodiversity to the area whilst having no impact on any historical or cultural interests. Security fencing and CCTV are incorporated into the design to ensure that it will not increase the risk of crime. The proposal also utilses the best available transport route whilst reducing impact upon such route. The proposal will be designed to ensure that it is energy and resource efficient whilst having a minimal impact on the environment and public safety.

DE03 – Sustaining Rural Communities

The proposal site does not fall within a Special Countryside Area as such it must sustain rural communities while protecting and improving the environment. It is noted that all developments must still comply with DE04, DE05 and DE06 which will follow this section. This policy goes on to state that as this a renewable energy project that RE01 must apply. Finally, the policy states that all development for buildings in the countryside must cluster, consolidate and group new development with existing established buildings.

In the policy clarification it goes further to say that *"clustering, consolidating and grouping new development with existing established buildings in the countryside facilitates new development which can benefit from the utilisation of existing services such as access and drainage. This can simultaneously mitigate the potential adverse impacts upon rural amenity and scenic landscapes arising from cumulative effect of one-off, sporadic development"*.

With regard to the Shaneragh project the site has been chosen in such a way that it is able to utilise existing services effectively such as transport and efficient drainage management. As such the site is located as close to the Dromore substation as possible without resulting in any adverse visual impact as well as being far enough away to protect nearby residents from any undue nuisance. The development has been carefully designed with this in mind, and when read with existing and approved development it is clear that the site is surrounded by existing development and would cluster and group withthis development with the Dromore substation acting as a focal point as shown in figure 4.1 below. From such, the proposal is able to demonstrate compliance with this policy.

Figure 4.1

DE04 - Integration and Design of the Development in the Countryside

Within this policy the main concern is the visual impact that any proposed development will have on the surrounding landscape. In terms of the proposed development the site has been chosen to utilise the undulating surrounding landform and existing landscaping to ensure a minimal impact on visual amenity. It is demonstrated in the supporting Landscape and Visual Assessment that the site will already visually integrate into the landscape through such landform and existing landscaping, however additional landscaping has been included in the design to support this further.. The design of the proposed development is typical of that of energy storage but has been sited and designed in such a way that it will not appear prominent or as an obtrusive feature.

DE05 - Rural Character

This policy will only permit development wherein it does not cause a detrimental change to, or further erode, the rural character of an area. From such, the site has been designed to ensure that it will not appear as unduly prominent given the landform and will not result any form of suburban style build-up and where possible has been able to respect the development pattern in the area. Finally it is evident that if approved

would not result in the creation of a ribbon of development nor add to one given the set back from the Skreen road.

DE06 – The Setting of Settlements

Within this document it states that the Council will not support any development that sits outside of an existing development that by virtue of being approved would mar the distinction between the settlement and open countryside or otherwise result in urban sprawl. Given that the site sits 4.5km from Dromore, 6km from Fintona,the proposed development will not mar any distance from such settlements. Finally, the development pattern is characterised by sporadic residential development and, if approved, the proposed site would not result in urban sprawl.

Policy RE01 – Renewable and Low Carbon Energy Generation

In this policy it states that the Council will permit development for the generation of energy from renewable or low carbon sources where it does not result in an unacceptable adverse impact upon on following criteria;

a) public safety, human health, or residential amenity;
b) visual amenity and landscape character;
c) biodiversity, nature conservation or historic environment and their settings;
d) local natural resources, such as air quality or water quality and quantity;
e) the safety of public footpaths, highways;
f) aviation interests, broadcasting installations and all other telecommunications;
g) public access to the countryside and/or recreational/tourist use of the area;
h) flood risk;
i) any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest; and
j) they do not create unacceptable cumulative impacts when viewed in conjunction with other operational and approved, and those which are currently the subject of valid but undetermined applications for renewable and low carbon energy generation developments.

Careful consideration has been given to the siting of this development wherein overall safety and impact on neighbouring amenity has been considered. As such, there is sufficient separation distance between the site and nearby residents that residential amenity is protected. Public safety and human health has been prioritised throughout the design of the proposal and has dictated aspects of the layout design including spacing between equipment and access provision. 24/7/365 monitoring of the proposed development, once operational, will also ensure that it poses no risk to public safety and human health.

Following on, the location of the compound has been chosen to allow for full utilisation of the existing landform and landscaping to preserve and protect visual amenity and landscape character. The area has been assessed as having a low contribution to biodiversity wherein this development aims to enhance the biodiversity through additional planting and the creation of the attenuation pond. The site is also sufficiently separated from any historic or conservation interests to be deemed to have an adverse impact on such and has been designed to ensure that the local natural resources remain unaffected.

The transport route and access arrangements have been fully considered to ensure minimal disruption to the safety of the public footpaths and highways and will not interfere with the public's access to the countryside

and use of the area. Given this type of development, it is considered that there should be minimal to no impact on aviation interests, broadcasting and telecommunications.

It is noted that the site does not lie within an existing fluvial floodplain, however part of the existing access lies within existing surface water flooding. Subsequently, a drainage report has been submitted alongside this application and demonstrates that flood risk is not a key issue and there are sufficient mitigation measures in place to ensure that the proposal does not increase flood risk on site or elsewhere. It is noted that the BESS compound does not fall within active peatland and therefore is not at conflict with this part of the policy. Finally, the proposal has been sufficiently separated from other renewable energy projects in the wider area, such that it is unlikely to result in any adverse cumulative impacts. The proposal is therefore compliant with Policy RE01.

TR01 – Land Use and Transport

A Transport Assessment (appendix.) accompanies this application that has fully considered the impact of the proposed development on highways. The intention is to use a similar access arrangements that Dromore substation used, all main roads to the Cavan Road. With the minor alteration to access the Skreen road off the Cavan Road to get to the site with minor widening to a portion of the Skreen Road. As such, it has concluded that the access arrangements do not prejudice road safety or significantly inconvenience the flow of traffic and there is capacity on the road network for this type of development. Finally, there is sufficient parking within the facility for vehicles during construction and operation.

SP01 – Furthering Sustainable Development

SP01 states that the Council will *"permit development proposals which further development and promote measures to mitigate and adapt to climate change, and which have regard to the Local Development Plan and other material considerations"*. Battery storage developments actively tackle climate change by increasing the stability of the grid network and therefore supporting the increased roll out of renewable energy developments. This development would not cause any demonstrable harm to any interests of acknowledged importance.

FLD03 – Sustainable Drainage Systems (SuDs)

A Sustainable Drainage System (SUDS) will be utilised to manage on-site surface water run-off. The proposed water attenuation ponds, located to the nortwhast of the energy storage compound, and associated drainage is shown on the infrastructure layout drawing (see drawing 05577-RES-LAY-DR-PT-001 - INFRASTRUCTURE LAYOUT). Further details are provided in Section 5 of this document and in the supporting Flood Risk and Drainage Assessment.

4.2.3 Planning Strategy for Rural Northern Ireland 1993

A number of policies within the Planning Strategy for Rural Northern Ireland 1993 have been subsequently replaced with more modern and up-to-date policies. The only remaining relevant policy within this document is Policy PSU8: New Infrastructure. The policy states *'the need for new infrastructure including extensions to existing facilities will be balanced against the objective to conserve the environment and protect amenity'*.

PSU8 outlines a list of criteria that is to be considered for all new infrastructure;

- Need for the facility
- Impact on the environment
- Impact on existing communities
- Impact on natural and man-made heritage
- Existence of alternative or routes
- Provision to mitigate adverse impacts.

The need for this proposal has been established in document above; the key need for the proposal is to stabilise and strengthen the existing electricity network. The proposed battery storage system has been carefully situated to provide the required support services to the existing substation and existing grid infrastructure.

Relevant environmental and technical assessments have been completed and summarised within section 5 of this report, in relation to visual, ecological, transport, noise and flood risk. The site has been carefully chosen to ensure that there is minimal to no adverse impacts on the wider environment with appropriate mitigation measures added where necessary to alleviate any concerns.

The site has been chosen to have minimal impact on neighbouring amenity, the nearest residential property is in excess of 250m away from the BESS compound. The Acoustic Assessment has shown to have no nuisance on this property or at any other residential property.

There is no historical features or interests within 5km of the site, as such the archaeological report shows there does not appear to be any natural or man-made heritage in close proximity of the site.

The proposed location was chosen upon completion of an assessment of the available capacity of the existing grid infrastructure to identify suitable substations to help identify appropriate and viable to install a battery storage facility. A thorough constraints assessment has been undertaken to identify this as a suitable site given its proximity to the substation.

A list of all the proposed mitigation measures has been listed in section 5.

4.3 Summary of Planning Balance

As evidenced in this section and the supporting documents, the proposed development will comply with the relevant legislation and planning, importantly, it draws support from the Regional Development Strategy given its objectives relating to promoting low carbon and sustainable development. The proposed development will not create any significant or unacceptable adverse effects on biodiversity, transport, flood risk, landscape, amenity and other sensitive environmental assets; it represents the best use of the site given its unique locational advantage in close proximity to the Dromore Electrical Substation which has available grid capacity. It has been designed with siting, design and servicing requirements in mind and has been coordinated with other infrastructure in the local area. Consequently, the proposed development's compliance with the development plan strategy has been demonstrated.

5 Technical Assessments

A number of supporting technical assessments have been carried out to support this full planning application. They have been submitted alongside this document, however, a summary of each of these is provided here.

5.1 Noise

An assessment in accordance with BS 4142: 2014 has been undertaken and submitted in support of this application in order to determine the acoustic impact of the proposed development.

The main sources of sound within the proposed development are the cooling fans for the inverters housed within the Power Conversion System (PCS) units, air conditioning for the Energy Storage Systems (ESS) and the transformers. The ESS units are expected to be continuously charging and discharging. If there are any rest periods for the PCS units these are likely to be infrequent and the Heating Ventilation and Air Conditioning systems (HVAC) will still be functioning.

The expected acoustic emissions from the equipment within the proposed development has been assessed against the baseline noise level within the vicinity of the site, with specific reference to background noise levels at 13 properties located closest to the proposal.

During the daytime, the predicted impact is low to minor at all houses. At night-time, an assessment based on absolute limits has been undertaken in accordance with the WHO Guidelines for Community Noise and BS 8233:2014. These absolute limits are met with a significant margin at all assessed houses. Therefore, no adverse impacts are predicted to occur at any time of day.

A cumulative assessment has been undertaken at five common receptors, the predicted cumulative impact during the day is low to minor at these receptors. A cumulative assessment based on absolute limits has been undertaken at night-time, and these limits were met with a significant margin at all five common receptors. Therefore, no adverse cumulative impacts are predicted to occur at any time of day.

5.2 Flood Risk and Drainage Management

A full Flood Risk Screening and Drainage Management Plan has been submitted alongside this application. This assessment is required as the development proposal exceeds the thresholds listed under Policy FLD02 ‘Development affected by Surface Water Flooding outside Floodplains’ of Fermanagh & Omagh Local Development Plan (LDP) 2030 Plan Strategy. A review of the available flood maps from Flood Map (NI) has shown that there is no identified river flood risk at the site from the watercourses however there areas of surface water flood risk within the site.

Flood maps from Flood Map (NI) have shown that there is a risk of surface water flooding at the site. The surface water flooding will only impact on one of the two access tracks into the site. This is an existing track that can still be allowed to flood if required so there will be no displacement of surface water flooding. Access/ egress from the site can be using the other access track if required.

An assessment of the drainage options has also been undertaken, in accordance with the SuDS manual surface water drainage hierarchy, the surface water from the site will drain via infiltration. The infiltration basins are sized to contain the 1 in 100 (plus a 20% allowance for climate change) rainfall event, as well as a fire

event. Infiltration testing will be undertaken on site prior to detailed design. Should the ground investigation prove that infiltration rates of the soil are not suitable for infiltration, the current design has allowed for sufficient size of basins that can attenuate surface water and discharge it, with the maximum discharge flow to be limited to pre-development runoff rates.

On site management of surface water from the BESS compound will be provided to prevent possible contamination, with surface water from the BESS compound will be restricted to the QBAR greenfield runoff rate of 16.8l/s.

Adequate measures have been included within the site design to effectively mitigate the surface water flood risk to the proposed development and from the development elsewhere. The development can therefore be considered as compliant with Policy FLD02 of the Fermanagh & Omagh Local Development Plan (LDP) 2030 Plan Strategy.

5.3 Transport

A full Transport Assessment form has been submitted to accompany this planning application. The document gives details of the anticipated traffic movements associated with the construction of the proposal as well as during the operational phase. It also assesses the suitability of the strategic road network to accommodate the development and provides the proposed transport route to the site.

The proposed transport route to site is to utilise the A35 (Clanaboggan Road) in either direction, taking the turn off for the Cavan Road. From such, the Cavan Road will be followed towards the entrance for Dromore substation, taking a left turn onto the Skreen Road. The two site accesses then sit on the left. From here, an internal access track, approximately 300m long, will head west to the energy storage compound situated to the eastern side of the site. This transport route is already used by the substation, wherein there will be a widening of the Skreen Road to accommodate the development. In the event of any road closures on the delivery route, all vehicles will follow the designated diversion route. No significant issues with the use of this transport route have therefore been identified.

Throughout the construction phase there will be a combination of HGVs (for the component and material deliveries) and cars/vans (for construction staff), visiting the site. HGV movements are expected to be most intense throughout the first weeks of construction whilst car/van movements are expected to be constant throughout. Following the construction of the project, vehicle movements to and from the site are expected to be limited to occasional maintenance visits, usually around one per month by a car, van or light goods vehicle.

Overall, the proposed development would not give rise to any severe or otherwise unacceptable impacts on the safety or operation of the local highway network.

5.4 Ecology

An Ecological Impact Assessment (EcIA) has been completed by RPS Ltd. The EcIA consists of a desk study of the site and surrounding area as well as an Extended Phase 1 Habitat survey of the site extent to map existing habitats and identify signs of any protected or notable species.

Designations

The site of the proposed project is not located within the boundary of any statutory or non-statutory designated sites of international, national, or local nature conservation importance. There are no designated sites within 15 km that are hydrologically linked to the proposed development. With the closest designated site/feature being Cranny Bog SAC/ASSI (1.8km away), Fairy Water Bogs SAC (11.3km) and Kirlish ASSI (13.2km).

Habitats

Almost the entirety of the site is classified as improved grassland and was assessed as being relatively low ecological value, mainly at site level. In addition this, the existing agricultural lane is deemed as bare ground with negligible ecological value. The hedgerows on site consist solely of Hawthorn, however most of the hedgerows on site are classified as species poor and intact, with various hedgerows being classified as species poor and defunct.

Protected Species

The EcIA reviewed the potential impact of the development on the main protected species; with regards to bats, it was noted that three trees had the potential bat roosting suitability with hedgerows on site may also being a suitable habitat for foraging and commuting bats. However the EcIA states a range of mitigation measures in such if implemented the development will have no significant effects on bats. There are no historical records of any otters within 1km.

Badger is a species considered vulnerable to persecution and in line with published advice from the NIEA, badger survey information must not be made publicly available. The results of the badger survey can be found in a Confidential Annex to the EcIA that will be submitted directly to the DAERA Planning Response Team.

The site has potential to provide habitat for an assemblage of common and widespread breeding bird species associated with improved grassland, hedgerow, and tree habitats on the site. However it is noted that there is limited suitable habitat on site that provides nesting, roosting and foraging habitat for bird species, with the main disruption occurring during the construction phase. Like the bats a range of mitigation measures in such if implemented the development will have no significant effects on birds.

Biodiversity Enhancement

Further to the EcIA, RES are committed to good ecological practices and enhancing biodiversity within and around developments. Landscape design should aim to deliver no net loss of habitat; incorporate planting that prioritises the use of native and wildlife friendly species; include both species diversity and structural diversity; leave areas of the site for natural succession with no active management; and enhance the ecological connectivity of the site to the surrounding environment.

It is recommended to re-plant areas of hedgerows and trees that are removed as part of the proposed development, incorporating a mixture of native species. With the implementation of these, the potential of the site to support local wildlife will increase and the proposed development is likely to lead to a significant positive effect on ecology.

It is concluded that once the suitable mitigation measures are in place that the proposed development will not have a significant effect on designated sites nor any protected species.

5.5 Cultural Heritage

A desktop Archaeological and Cultural Heritage assessment has been submitted to accompany this planning application. In such, the Plan Strategy and PPS 6 set out policies in respect on archaeological heritage alongside a range of legal instruments to protect architectural heritage.

There are no recorded archaeological or other cultural heritage sites or features within the subject site. However, there are three archaeological sites recorded on the Sites and Monuments Records (NISMR), three Industrial Heritage Record sites, and one Historic Building recorded within the 1km radius study area which surrounds the subject site. It is concluded that there is no predicted impact on these recorded cultural heritage site given the distance between the site and these assets coupled with the lack of intervisibility due to the landform.

The subject site is also bounded to the north by the historic townland boundaries between Shannaragh and Mullawinny. These boundaries have been in existence since at least 1840 and are therefore noteworthy due to their antiquity. It is expected that these boundaries will be retained during the proposed development, and therefore there is no predicted impact on this undesignated landscape feature.

The desktop study and the consultation of the licenced excavations database showed evidence of archaeological activity within the townland of Shannaragh. Moreover, a multiperiod archaeological site, was identified and excavated at the footprint of the existing Dromore Main Substation, 130m to the southeast of the subject site. As such, the subject site has a moderate to high potential to contain previously unrecorded subsurface archaeological deposits. In the absence of mitigation measures, the construction of Shannaragh BESS could impose a direct impact on potential, previously unrecorded archaeological features, should these exist subsurface within the subject site.

Given the abovementioned archaeological potential and the apparent relatively undisturbed nature of the fields within the subject site, it is recommended that if feasible a programme of archaeological test trenching be carried out in advance of the construction phase. This will allow time to devise a mitigation plan in the event of archaeological deposits being found. It is felt that this could be dealt via a planning condition of any planning permission.

5.6 Fire Risk

The Planning Application includes a Fire Risk Statement illustrating how the project has been developed to address any risk of fire through inter-alia, in-built design mitigation measures. The document sets out the key principles and mitigation measures based on current best-practice measures. These will inform the preparation of a detailed Fire Risk Management Plan at detailed design stage. Again, the details of this will be provided to Fermanagh and Omagh District Council in advance of development. It is expected this will be a condition of any emerging consent.

The overarching principles of the fire-risk strategy are to:

- Implement measures to result in a very low risk of fire ignition;
- Implement measures that result in a very low risk of fire propagation and spread;
- Ensure the risk of fire spread between project elements is minimised through design standards; and

- Ensure adequate provisions to allow the fire service to monitor any fire.

Mitigation measures to protect against fire risk include, but are not limited to:

- Adequate spacing between BESS units. The site layout aligns with best practice guidance;
- Fire protection systems within each Battery Storage Enclosure including alarms and automatic suppression system;
- Spacing from boundary planting. There is no existing or planned vegetation within 10m of any Battery Storage Enclosure.
- 24/7/365 monitoring of the system from a remote control centre.

During detailed design, following battery product selection, a project specific Fire Risk Management Plan will be developed, in liaison with the Fire Service and with due consideration of the NFCC Guidance. This Fire Risk Management Plan will include:

• A fire risk appraisal that details how the fire response strategy above will be achieved, including the identification and design of any further mitigations required to achieve the strategy above.

• An emergency response plan.

Overall it is considered that this development will take every reasonable precaution it can in line with best practices, implementing suitable mitigation measures to ensure the system operates safety throughout its lifetime. A working relationship with the fire service will be established to ensure that, if approved, the development will operate safely.

5.7 Landscape

A Landscape and Visual Assessment (LVIA) has been completed by RPS Ltd. in order to consider the site and its surrounding context in both landscape and visual terms, to assess the potential effects of the proposed energy storage system upon landscape features, landscape character and visual amenity. This assessment was completed via a desk study analysis of the site and its policy context, as well as site visits to gain an appreciation of the landscape and visual context of the site. Alongside the LVIA, a detailed Landscape mitigation plan has been completed and included within the assessment.

Overview

The site is approximately 6.5 hectares in size and is comprised of agricultural fields accessed from Skreen Road, immediately north-west of the existing Dromore Main Substation. The site lies within the administrative area of Fermanagh and Omagh District Council.

The site is not located in an area included in a statutory landscape designation at the national or local level. The Proposed Development site is comprised entirely of arable pastoral farmland, with small to medium sized fields well defined by managed mixed species hedgerows, and hedgerows with maturing trees which provide containment. The Proposed Development site lies within RLCA 4 – Omagh Basin – with the key characteristics identified as low lying landscape of pastoral drumlin farmland, framed by uplands on all sides. Drumlins are

most obvious to the south and west becoming less of a characterising factor towards the east in the Camowen Valley which is broad and shallow.

The drumlin landscape surrounding the Proposed Development site, forms a degree of enclosure which is further enhanced by the presence of field boundary hedgerows and hedgerows with trees. Whilst woodland forms a minor element within the landscape surrounding the Proposed Development site, mixed species and pockets of coniferous woodland are found immediately north and south-west of the site, which provide further enclosure and textural interest within available views.

In respect of landscape character, published guidance is available at a regional and local level, The Northern Ireland Landscape Character Assessment 2000 (NILCA 2000) contains landscape briefs for each of the 130 landscape character areas in Northern Ireland surveyed in 1999. A review of the NILCA 2000 indicates that the Proposed Development is located within one Landscape Character Areas (LCA); 22 Omagh Farmland.

Proposed development and landscape strategy

Landscape mitigation proposals include:

- Earthworks to create a practical development platform
- Retention of existing boundary hedgerows, trees, shelterbelt planting and roadside vegetation on peripheral and internal boundaries, with larger trees and shrubs to be planted in localised areas.
- Strengthening of existing vegetated internal boundaries, through management regimes for hedgerows and / or planting of locally appropriate hedge species to provide continuity in extent of hedgerow.
- Attenuation basins in the northern parts of the site; and
- Landscape planting and habitat enhancement in respect of landscape and ecological mitigation.

As well as providing the intended filtering and screening of views towards the proposed development, all of the proposed planting has been designed to fit with the local landscape character and vegetation patterns.

Landscape Character Effects

The proposed development would result in the conversion of a small and single parcel of agricultural land to a BESS and associated ancillary infrastructure. The changes to the physical landscape resources are limited to the site and limited to the landform and land use. The impacts on landform will not be of a sufficient scale to alter the overall profile of the area, not would the change in land use form a notable disturbance to the wider pattern of agricultural use.

Mitigation inherent in the proposed development will reduce the influence of this over a relatively short timescale. It's important to note that the proposed development is not limited to the adverse impacts of the built elements of the BESS and its infrastructure, but also include positive elements in respect of the contribution to landscape character in the form of hedgerow, tree belts, scrub planting and wildflower grasslands.

The assessment of impacts on landscape character has determined that the significance of effect on the 'LCA 22 'Omagh Farmland' will be moderate, temporary, short-term assessed as locally significant effects are

predicted to be experienced during the construction phase of the Proposed Development. Remaining portions of the LCA outside of the Proposed Development boundary are predicted to experience no significant indirect effects. In terms of the operational phase the significance of the impact is deemed to be Minor localised, long-term, reversible prior to establishment of mitigation planting. It is noted that there is no change during construction and operational phase to Sperrins AONB, Cranny Bog ASSI, Historic Parks & Gardens, The Ulster Way, Way Marked Trails.

Overall, this level of impact and effect in terms of the landscape character, particularly given the limited context and containment of the site, is not considered to be significant overall.

Visual Effects

Overall, views of the site, and likely direct views of the proposed development, are restricted to a relatively limited area, including the site itself and from locations in the immediate context of the site. There are some views from the wider landscape context but the site and proposed development will not form prominent components in these long distance views.

Overall, the proposed development in all but the local viewpoints were deemed to have no change during the operational and construction phases. With notable effects limited to locations on or adjacent to the site, from the Skreen Road. However, mitigation inherent in the proposed development will be successful in reducing impacts and effects over time.

In longer distance views towards the site from the wider surrounding area, the proposed development is either not prominent, is consistent with the existing character, or is unlikely to be visible in the view.

Consequently, visual effects are not considered to be significant overall.

Overall, it is considered that the proposed development incorporates a robust landscape mitigation strategy that is included as an inherent part of the scheme. This will avoid or minimise potential adverse effects. Consequently, landscape and visual effects arising from the proposed development, even where these are higher in the short term, remain limited and highly localised overall.

6 Pre-Application Community Consultation (PACC)

The Pre-Application Community Consultation (PACC) Report which is submitted with this application, outlines how RES has engaged with the local community to inform them on the Proposed Development.

The report explains how and when the community was consulted before the planning application was submitted to Fermanagh and Omagh District Council and how this consultation has shaped the Proposed Development.

The PACC Report summarises those activities undertaken, details how comments received from the community were considered and sets out if any consequent changes or mitigating measures have been included in the proposal.

The consultation activities described within this Report demonstrates how PACC has been undertaken in accordance with requirements in respect of same, set out in the Planning Act (NI) 2011, Regulation 5 of the Planning (Development Management) Regulation (NI) 2015 and other relevant guidance including Development Management Practice Notice 10 – Pre-Application Community Consultation.

In summary, a range of engagement and communication activity was undertaken as part of the pre-application community consultation - reaching both local stakeholders as well as audiences in the wider area. This activity included:

- Letters to elected representatives;
- Advertisement for the public exhibition in the local press;
- Newsletter informing local residents and elected representatives about the public exhibition;
- Public exhibition; and
- Project website information.

This form of pre-application community consultation is in accordance with The Planning (Development Management) Regulations (Northern Ireland) 2015.

RES engaged early with the local community to encourage a constructive consultation process and has undertaken all necessary statutory pre-application consultation. All feedback received during the pre-application consultation period, through all consultation activities, has been considered by the Applicant throughout the design iteration and pre-planning stages of the Proposed Development. A summary of feedback, issues and concerns raised, together with the Applicant's response to each can be found in the report.

7 Conclusions

It is considered that the proposed development complies with the requirements of all relevant development plan policies and other local and national policy and guidance, and there are no other material planning considerations that suggest that the proposed development should be opposed. The proposed development is, undisputedly, sustainable and low carbon development, which is supported and encouraged by policies within Fermanagh and Omagh Draft Plan Strategy.

The proposed development has a unique locational requirement to be positioned in this particular site, significantly close to the Dromore Electrical Substation, where there is the available capacity to connect to the grid network. Every effort has been made to ensure that any impacts upon the surrounding area are kept to an acceptable level and the supporting technical assessments conclude that:

- Whilst landscape impacts may be possible at nearby sensitive receptors, the total extent of the landscape and visual effects would be localised and limited in nature. The proposed location has been chosen to utilise the undulating landform and existing landscaping coupled with proposed landscaping will significantly help to reduce any impacts and ensure they remain at an acceptable level.
- No observed adverse effect on health or quality of life would be expected due to noise from the proposed development.
- There will be no significant adverse effects on any statutory or non-statutory designated environmental sites as a result of the proposed development given the site being carefully chosen to allow for a suitable buffer zone. It is considered that there will also be no significant adverse effects upon protected or notable species. The proposed habitat creation and enhancement measures mean that the proposed development will lead to a positive effect on biodiversity.
- There will be no significant adverse effects on any designated or non-designated built heritage assets as a result of the proposed development.
- The development will not be at unacceptable risk of flooding, nor increase flood risk on or surrounding the site. A suitable SUDS has been proposed and will be implemented following further site assessment to manage surface water.
- No severe or otherwise unacceptable impacts on the safety or operation of the local highway network would be observed.
- The development is compliant with the policy objectives of the Plan Strategy, the SPPS and The RDS 2035.

There is an urgent need for energy storage facilities, such as this proposal, in order to facilitate the increased penetration of renewable and low carbon generation by providing critical flexibility services to smooth out the peaks and troughs of generation and demand, therefore ensuring continuity, security and decarbonisation of Northern Ireland's energy supply. It is considered that the significant benefits from this proposed storage development outweigh any limited local impacts which have been satisfactorily mitigated by way of a

carefully considered siting and design approach. It is therefore requested that Fermanagh and Omagh District Council grant planning consent for this crucial development without delay.

Appendix A

A.1 Schedule of Drawings

Drawing Number	Drawing Title
05577-RES-MAP-DR-XX-001	Location Plan
05577-RES-LAY-DR-PT-001	Infrastructure Layout Plan
05577-RES-BAT-DR-PT-001	Battery Enclosures
05577-RES-PCS-DR-PT-001	Power Conversion System and Transformer
05577-RES-SEC-DR-PT-001	Lighting and CCTV
05577-RES-SUB-DR-PT-001	Substation Building
05577-RES-SUB-DR-PT-002	Grid Compliance Equipment
05577-RES-SUB-DR-PT-003	Auxiliary Transformer
05577-RES-SUB-DR-PT-004	Spares Storage Container
05577-RES-SEC-DR-PT-002	Acoustic Fencing

A.2 Schedule of Technical Reports and Documents

Report / Document	Author
Landscape and Visual Assessment	RPS Ltd
Detailed Landscape Proposal	RPS Ltd
Preliminary Ecological Appraisal	RPS Ltd
Historic Environment Desk-Based Assessment	John Cronin
Acoustic Assessment	RES Ltd
Flood Risk Screening and Drainage Management Plan	RPS Ltd
Transport Statement	RPS Ltd
Outline Construction Environmental Management Plan	RES Ltd
Pre-Application Community Consultation (PACC) Report	RES Ltd