



Our Ref: JS/MC

21st May 2024

FINN'S SANDWICH
 1-3 King Street
 Sandwich
 Kent CT13 9BY
 Sales: 01304 612147
 Lettings: 01304 614471
 Email: sandwich@finns.co.uk

Offices also at:
 CANTERBURY
 ST NICHOLAS AT WADE

Dear Sir/Madam,

Response to Canterbury City Council New Local Plan Regulation 18 Consultation, Policy C20

I am writing with regard to the proposed response to the Canterbury Local Plan Regulation 18 Consultation on behalf of Mr D O'Brien, landowner of part of the land proposed for allocation under Policy C20, for delivery as a strategic wetland to OBJECT to the allocation of part of this land for strategic wetland use.

Previous submissions were made on 10th January 2023, where it was explained that part of Mr O'Briens land was in advanced talks regarding the siting of a battery storage renewable facility and that this was therefore not available to be included within the strategic wetland proposed by the Council. Unfortunately it appears this has not been taken into account in the new Regulation 18 Draft Plan, as the land remains under proposed allocation for strategic wetland.

Work on the proposed renewable energy battery storage facility, to complement the Broadoak electricity facility, has progressed with UK Power Networks and the site has a grid connection to the mains network grid. We have seen a plan, below, of the general arrangement of the proposed ponds layout for the new wetland area drawn by Water Design Engineers. Our Client's land incorporates the ponds labelled 1A, 1B, 2A and 2B shown on the pond layout plan. The Plan does not appear to take account of the existing underground mains network power cables, with pond 2B proposed to be crossing over an existing underground cable. Clearly this is dangerous and unacceptable.



There is also concern that insufficient clear land has been retained for access for vehicles to service these underground cables, including heavy equipment that needs manoeuvring area to dig up access to the cables when required. Battery storage

Finn's is the trading name of Finn's (1865) Ltd. and incorporates Amos Dawton & Finn.

Registered in England and Wales.
 Registered Number 3231108





facilities are essential in speeding up the replacement of fossil fuels with renewable energy and play a key part in ensuring homes and businesses can be powered by green energy at all times and is not weather dependant, by storing excess energy in a clean and safe manner and releasing it back to the National Grid at times of peak demand. Limitations on land in sufficient close proximity to the Broadoak electricity facility in the Sturry Road area are extensive due to existing land uses giving a very limited window of opportunity in terms of location to provide a battery storage facility.

The Canterbury District supports renewable energy provision through draft emerging Policy DS25 developments however does not recognise the importance of battery storage facilities in ensuring renewable energy produced is not lost through periods of lower usage and can instead be safely stored for use in periods of demand. Provision of an energy storage solution on this site in the form of battery storage should be supported due to the close proximity to the Broadoak electricity facility and the lack of any other available land for this purpose in close proximity. This would also support the Council's Climate Change Action Plan aims and objectives in maximising the use of renewable energy sources and accelerate the move towards net zero carbon.

The Climate Change Action Plan also sets out District Climate Action DCA3 which seeks provision of an Energy Innovation Area to enable energy and low emissions strategy projects. It must be recognised that as part of this, energy development has to be located where it can feed back into the National Grid and for Canterbury, this is a very limited area close to the existing Broadoak electricity facilities. For this reason, our Client does not support the allocation of areas covered by ponds 1A and 1B to be included within the wetland allocation area and reiterates again, as landowner, that this land is not available for this use.

The area covered by 1A and 1B should be allocated for provision of a renewable battery storage facility along with suitable widened access routes provided from the mains grid connection point located at the north eastern corner of pond 2A along the northern site boundary and all areas where access will be needed by UK Power Networks to their underground cables needs to be removed from proposed pond use.

Whilst the land falls under a Local Wildlife Designation, emerging Draft Policy DS19 which seeks to protect local wildlife sites does allow for 'development within such a designated area provided the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site'. In this case, there is a severe lack of any suitable land with the required close proximity to the Broadoak electricity facility where a battery storage facility could be located and it would be a missed green energy opportunity for the District if this land were not allocated for battery storage facilities, which would bolster the District's ability to meet energy demands at all times in a sustainable manner, when no other suitable sites are available. This would support the aims of the Council's Climate Change Action Plan.

The land currently proposed as ponds 1A and 1B in the western corner of the proposed allocation area under Policy C20 is available and suitable for the provision of a battery storage facility within the first five years of the Plan. We reiterate that this area of land is **not available for the proposed wetland** allocation and should be removed from the proposed policy allocation.

Proposed ponds 2A and 2B are also proposed on our Client's land and would remain available for inclusion within the proposed wetland subject to confirmation that sufficient areas of land are retained for access to the underground mains power cables and the mains grid connection point.

Kind regards

Jane Scott BA(Hons) Dip.TP MRTPI
j.scott@finns.co.uk