

Report

Report to: Planning Committee

Date of Meeting: 14 May 2019

Report by: Executive Director (Community and Enterprise

Resources)

Application no: P/19/0214

Planning proposal: Installation of battery storage facility at existing wind farm together

with associated infrastructure (Section 36 application)

1 Summary application information

Application type: Electricity notification S36 application

Applicant: Scottish Power Renewables (UK)

Location: Whitelee Wind Farm

East Kilbride South Lanarkshire

2 Recommendation(s)

2.1 The Committee is asked to approve the following recommendation(s):-

- (1) That the Scottish Government is informed that South Lanarkshire Council has no objection to the proposed installation of a battery storage facility under Section 36 of the Electricity Act 1989
- (2) Authorise the Head of Planning and Economic Development to undertake any discussions, further agreements of conditions and planning obligations if required, with the Scottish Government

2.2 Other actions/notes

(1) The Planning Committee has delegated powers to deal with the notification.

3 Other information

Applicant's Agent: Arcus Consultancy Services Ltd
 Council Area/Ward: 05 Avondale And Stonehouse

♦ Policy Reference(s): South Lanarkshire Local Development Plan

(adopted 2015)

Policy 2 - Climate Change

Policy 3 - Green Belt and Rural Area Policy 4 - Development management and

placemaking

Policy 15 - Natural and Historic Environment Policy 17 - Water Environment and Flooding

Policy 19 - Renewable Energy

Supplementary Guidance 1: Sustainable Development and Climate Change

Supplementary Guidance 2: Green Belt and Rural Area

Supplementary Guidance 3: Development Management, Placemaking and Design

Supplementary Guidance 9: Natural and Historic Environment

Supplementary Guidance 10: Renewable Energy

Proposed South Lanarkshire Local Development Plan 2 (2018)

Policy 1 Spatial Strategy

Policy 2 Climate Change

Policy 5 Development Management and

Placemaking

Policy 13 Green network and greenspace

Policy 14 Natural and Historic Environment

Policy 15 Travel and Transport

Policy 16 Water Environment and Flooding

Policy 18 Renewable Energy

DM1 New Development SDCC2 Flood Risk SDCC3 Sustainable Drainage Systems

♦ Representation(s):

•	0	Objection Letters
>	0	Support Letters
>	2	Comment Letters

♦ Consultation(s):

Roads Development Management Team

Environmental Services

Roads Flood Risk Management

WOSAS

Countryside and Greenspace

Planning Application Report

1 Application Site

- 1.1 The applicant is Scottish Power Renewables (UK) who operate the existing Whitelee Wind Farm. This wind farm is currently the UK's largest onshore wind farm located on Eaglesham Moor. It comprises 215 turbines and has a generating capacity of 539MW. Due to the wind farm's size, it is located within 3 separate local authority boundaries, of which South Lanarkshire is one. The wind farm was granted consent in 2006 and has been in full operation since 2009.
- 1.2 The windfarm was the subject of an application made to the Scottish Government under section 36 of the Electricity Act 1989 as the generating capacity exceeds 50MW. Any proposed development that would add capacity to the wind farm is assessed cumulatively and, where this exceeds 50 MW, falls within the scope of the Electricity Act. As a result, this proposal is the subject of an application to the Scottish Government.
- 1.3 The application site is located within an area of the Whitelee Wind Farm that is wholly within South Lanarkshire's administrative boundary. The Council is, therefore, a statutory consultee to the S36 application. The application site is located within an existing sub-station compound within the wind farm and is located some 250m west of the Ardroch Road. The nearest property to the application site is some 450m to the south east. The application site covers ground previously developed as part of the construction of the sub-station.

2 Proposal(s)

- 2.1 An application has been made to the Scottish Government under Section 36 of the Electricity Act 1989 for the installation of a battery storage facility within the existing wind farm together with associated transformers and cabling. The proposals comprise the following components:-
 - Battery Room
 - Switchgear Room
 - Inverters
 - Supervisory Control and Data Acquisition equipment
 - Wellfare Facilities and Maintenance Room

The above components are to be housed in a single, battery storage building. The battery storage building comprises a portal frame building some 44.5m by 34m with a height of 6.8m. The building is to be located adjacent to an existing substation for ease of power transmission and to limit the amount of cabling required. The land the building is to be built upon is part of the substation compound and has previously been disturbed as part of the substation construction and is therefore already 'made' ground.

2.2 The battery storage facility would capture power from the turbines at times when the national grid has no spare capacity. Rather than closing the turbines down, it would allow turbines to produce power which could be stored by the battery and then released into the grid as demand is required.

2.4 Battery technology has greatly increased over a very short period in recent times and is expected to continue to evolve rapidly. Currently, batteries of this nature have a storage capacity of approximately 5MW but this is expected to improve in a short time. If this application is consented it may be that the capacity of the battery will have increased further by the time construction is started. Whilst the battery capacity may increase, the building it is to be housed within would not and, therefore, for the purposes of this planning consultation response, the capacity of the battery storage is not considered but the associated built development (the battery housing) is. It should also be noted that the battery storage is solely for energy produced by the existing wind farm and, whilst allowing the existing turbines to be more efficient, does not involve any additional energy generation in its own right. It should also be noted that any community benefit funds generated from the wind farm are based on the turbines' output and, therefore, whilst the battery storage would allow increased output, the energy stored within the battery would already have been taken into account when calculating the output produced by the turbines. The battery would, therefore, not affect any financial benefits apart from allowing the turbines to occasionally produce electricity to be stored when there is no capacity for it to be exported to the national grid. Any planning obligation attached to the existing wind farm, therefore, remains unchanged in relation to these proposals.

3 Background

3.1 **National Policy**

- 3.1.1 National Planning Framework 3 (NPF3) June 2014 sets out the long term vision for the development of Scotland and is the spatial expression of the Scottish Government's Economic Strategy. It has a focus on supporting sustainable economic growth which respects the quality of the environment, place and life in Scotland and the transition to a low carbon economy. The framework sets out strategic outcomes aimed at supporting the vision a successful, sustainable place, a low carbon place, a natural, resilient place and a connected place. NPF 3 also notes in paragraph 3.8 "We want to meet at least 30% of overall energy demand from renewables by 2020 this includes generating the equivalent of at least 100% of gross electricity consumption from renewables, with an interim target of 50% by 2015".
- 3.1.2 Scottish Planning Policy (SPP) June 2014 aligns itself with NPF3 and one of its policy principles states that there will be "a presumption in favour of development that contributes to sustainable development" (page 9). At paragraph 28, SPP states that "the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost." The SPP also identifies a number of considerations to be taken into account when determining energy infrastructure developments, including net economic benefit, the contribution to renewable energy targets, cumulative impacts, visual impacts, residential amenity, and landscape and visual impacts (paragraph169).
- 3.1.3 The Scottish Government's Onshore Wind Policy Statement (December 2017) sets out the considered views of Scottish Ministers, following consultation, with

regard to onshore wind energy and how renewable technology continues to evolve.

3.2 **Development Plan Status**

- 3.2.1 The proposed development requires to be considered against the approved Glasgow and Clyde Valley Strategic Development Plan 2017 (GCVSDP) Onshore Wind Spatial Framework (paragraphs 7.8 and 7.9). The Onshore Wind Spatial Framework is aligned to increasing energy efficiency and reducing carbon emissions. Diagram 6 identifies areas within the city region that are likely to be most appropriate for onshore wind farm development. Policy 10, Onshore Energy, requires proposals to accord with local development plans. With regard to this proposal, it is noted that the site is located within an existing, operational wind farm.
- 3.2.2 The South Lanarkshire Local Development Plan (SLLDP) was adopted in 29 June 2015 and contains the following policies against which the proposal should be assessed:
 - Policy 2: Climate change
 - Policy 3: Green belt and rural areas
 - Policy 4: Development management and placemaking
 - Policy 15: Natural and historic environment
 - Policy 17: Water environment and flooding
 - Policy 19: Renewable energy
- 3.2.3 The following approved Supplementary Guidance documents support the policies in the SLLDP and also require assessment:
 - Supplementary Guidance 1: Sustainable Development and Climate Change
 - Supplementary Guidance 2: Green Belt and Rural Area
 - Supplementary Guidance 3: Development Management, Placemaking and Design
 - Supplementary Guidance 9: Natural and Historic Environment
 - Supplementary Guidance 10: Renewable Energy
- 3.2.4 On 29 May 2018, the Planning Committee approved the proposed South Lanarkshire Local Development Plan 2 (Volumes 1 and 2) and Supporting Planning Guidance on Renewable Energy. The new plan builds on the policies and proposals contained in the currently adopted South Lanarkshire Local Development Plan. For the purposes of determining planning applications, the proposed South Lanarkshire Local Development Plan 2 is now a material consideration. In this instance the following policies are relevant:

Volume 1

- Policy 1 Spatial Strategy
- Policy 2 Climate Change
- Policy 5 Development Management and Placemaking
- Policy 13 Green network and greenspace
- Policy 14 Natural and Historic Environment
- Policy 15 Travel and Transport
- Policy 16 Water Environment and Flooding

Policy 18 Renewable Energy

Volume 2

- DM1 New Development
- SDCC2 Flood Risk
- SDCC3 Sustainable Drainage Systems
- 3.2.5 All these policies and guidance are examined in the assessment and conclusions section of this report. It should be noted that LDP2 policies are only referenced if they do not accord with the existing policy context in SLLDP.

3.3 **Planning Background**

3.3.1 The application site is located within an established, operational wind farm that, due to its power capacity, received consent from the Scottish Ministers through the Electricity Act 1989 in 2006 and it became operational by 2009.

4 Consultation(s)

4.1 Roads and Transportation Services (Traffic and Transportation) — no objection subject to conditions requiring traffic management plan and swept path analysis for the delivery of the battery components and the provision of adequate on site staff parking.

Response: Noted, any consultation response to the Scottish Government stating no objection would be predicated on the basis of conditions requiring the further approval of a traffic management plan, swept path analysis and a parking and site layout plan.

4.2 **Roads and Transportation Services (Flood Prevention)** - no comments to make.

Response: Noted.

4.3 <u>Countryside and Greenspace</u> – no objection to the proposal subject to it not affecting public access within the wind farm including the Arrdochrig public car park.

Response: Further discussions have taken place with the Whitelee Wind Farm Access Project Manager who confirmed that the proposals would have no effect on any public access including parking within the wind farm.

- 4.4 West of Scotland Archaeology Service (WOSAS) note that the proposals are to be located on previously disturbed land and in an area where there is unlikely to be any potential for sub-surface archaeological material to be in situ and, therefore, have no objections or further comments to make on the proposals. Response: Noted.
- 4.5 <u>Environmental Services</u> have no objections to the proposals subject to noise limits being placed on the proposals to protect the amenity of residential properties in the area.

Response: Noted, the rural and remote location of the site renders it unlikely that any noise issues will be experienced by the nearest neighbours over 450m away but it is prudent to use the precautionary principle and recommend that noise levels are set as conditions to any consent. It should be noted that the noise levels

proposed by Environmental Services have been discussed with the applicant and they have confirmed that they will be well within their tolerances and are content with these levels being conditioned by Scottish Ministers should they approve the application.

5 Representation(s)

- 5.1 Statutory advertisement of the application was undertaken by the applicant in January 2019 and 2 comments neither supporting nor objecting to the proposals have been made to the Scottish Ministers.
- 5.2 Whilst not objecting to the proposals, the comments make the following points:
 - a) All wildlife, flora and fauna in situ must be given all possible protection during construction and thereafter

 Response: As noted in para 6.13 below, a Phase 1 extended habitat survey has been carried out as part of the planning submission. The application site is within an existing sub-station compound on previously developed land which has a low habitat value.
 - b) This application does not give a proper statement of the benefits. If the decision is made on the application documents as submitted, it will be based on incomplete information. The Company will have a reasonable idea of the likely capacity from the technical and business modelling it must have undertaken to reach the investment decision leading to this application. This 'reasonable idea' would be sufficient to properly inform the decision-maker. It should be provided as supplementary information by the applicant.

 Response: The Scottish Government is the ultimate decision maker for an application of this nature and has deemed that it has received adequate information to register the application. The consultation request to South Lanarkshire Council included adequate information to allow an assessment and subsequent response to be made.
- 5.3 These letters were sent directly to the Scottish Government and can be viewed through the Energy Consents website. The letters were not directed to or copied to the Council and the above is for noting only.

6 Assessment and Conclusions

6.1 This application has been submitted to the Scottish Government under Section 36 of the Electricity Act 1989 as it is development adding additional capacity to a wind farm with a generating capacity of over 50MW. In this instance, South Lanarkshire Council is a Consultee to the application process and is not the Consenting Authority. Under the terms of Section 25 of the Town and Country Planning (Scotland) Act 1997, all applications must be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance, the application is made under the Electricity Act 1989 and not the Planning Act and, therefore, the Development Plan does not have the primacy it normally would for planning decisions but it is still an important material consideration in this instance.

- In terms of National Planning Policy and Guidance, NPF 3 notes in paragraph 3.8 6.2 that the Government seeks to meet at least 30% of overall energy demand from renewables by 2020. This includes generating the equivalent of at least 100% of gross electricity consumption from renewables, with an interim target of 50% by 2015. SPP Policy Principles (page 9) state that there will be "a presumption in favour of development that contributes to sustainable development." At paragraph 28, SPP states that "the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost." The SPP also identifies a number of considerations to be taken into account when determining energy infrastructure developments, including net economic benefit, the contribution to renewable energy targets, cumulative impacts, visual impacts, residential amenity, and landscape and visual impacts (paragraph169).
- 6.3 It is considered that the battery storage building is to be located adjacent to an existing electricity sub-station which would minimise its visual impact upon the landscape as it would be clustered within an existing development. Its location also minimises any cabling required to transfer power to and from the sub-station. The rural nature of the site minimises the proposal's impact upon any residential properties. The proposals would allow existing wind turbines the ability to generate power even when there is no need for it to be exported to the national grid and therefore is considered to enhance and increase the renewable energy generated by this established wind farm.
- 6.4 The proposed development requires to be considered against the approved Glasgow and Clyde Valley Strategic Development Plan 2017 (GCVSDP) Onshore Wind Spatial Framework (paragraphs 7.8 and 7.9). The Onshore Wind Spatial Framework is aligned to increasing energy efficiency and reducing carbon emissions. Diagram 6 identifies areas within the city region that are likely to be most appropriate for onshore wind farm development. The methodology used in devising the Onshore Wind Spatial Framework is set out in Part Two of Background Report 10 Low and Zero Carbon Generating Technologies. section 15.10, the background report acknowledges that wind turbine development is likely to be acceptable subject to detailed consideration against local policy criteria and that potential wind farm development should not be viewed in isolation. It goes on to state that developers and interested parties must refer to any local guidance made available by the local planning authority, including local development plans and supplementary guidance, and landscape capacity studies. Policy 10, Onshore Energy, requires proposals to accord with local development plans. With regard to this proposal, it is noted that the site is located within the Areas with Potential for Wind Farm Development identified in Diagram 6 of Clydeplan. The proposed development, by its nature, contributes to developing low carbon energy. The visual, landscape and cumulative impact of the proposal is assessed below and concludes that there would not be an adverse effect. Consequently, it is considered that the proposal accords with Policy 10 of Clydeplan.
- 6.5 In the Adopted South Lanarkshire Local Development Plan (SLLDP) 2015, the overall strategic vision is 'to promote the continued growth and regeneration of South Lanarkshire by seeking sustainable economic and social development

within a low carbon economy whilst protecting and enhancing the environment.' Policy 2, Climate Change, seeks to minimise and mitigate against the effects of climate change by a number of criteria. The criteria relevant to this proposal are (iii) utilising renewable energy sources, (vii) having no significant adverse impacts on the water and soils environment, air quality, biodiversity (including Natura 2000 sites and protected species) and green networks. Taking into account the battery proposals would increase the amount of electricity the wind turbines can generate by providing storage capacity, in line with Government targets on renewable energy generation, it is considered that the proposal complies with Policy 2 and that of the advice in the SG Sustainable Development and Climate Change.

- 6.6 Policy 3, Green Belt and Rural Area, states that the Green Belt and rural area functions primarily for agricultural, forestry, recreation and other uses appropriate for the countryside. The proposal is located within the rural area. SG 2, Green Belt and Rural Area, lists in Appendix 2 renewable energy as an appropriate use within this area and refers to the SG Renewable Energy, and SG Sustainable Development and Climate Change for further guidance. It is considered that the principle of the development has already been deemed acceptable within the Rural Area, given they are ancillary to an existing wind farm and, therefore, there are no further implications for the countryside strategy set out within the Development Plan.
- 6.7 Policy 4, Development Management and Placemaking, states that development proposals should have no significant adverse impacts on the local community, landscape character, habitats or species, including Natura 2000 sites, biodiversity and Protected Species nor on amenity. Policy 4 also states that development should be integrated with the local context and landscape. This advice is within Development Management, Placemaking Supplementary Guidance under Policy DM1 - Design. The principle of a wind farm has already been established and ancillary battery storage is, therefore, acceptable under this policy. As noted in 6.3 above, the location of the proposal adjacent to an existing building minimises the visual impact of the proposals. The remote location of the site also minimises its impact upon the residential amenity of the surrounding area. Due to topography and existing surrounding vegetation, the proposals are relatively screened from wider views within the area. The design of the battery storage building, whilst functional, is similar in scale and design to typical agricultural buildings found within rural areas which further minimises the development's impact upon the surrounding landscape.
- 6.8 Policy 15, Natural and Historic Environment, and the associated Supplementary Guidance provides the context for assessing all development proposals in terms of their effect on the character and amenity of the natural and built environment. It seeks to protect important natural and historic sites and features as listed in Table 6.1 of the SLLDP from adverse impacts resulting from development, including cumulative impacts. The policy categorises each of the natural and historic environment designations within three distinct groups and are assessed in turn below.
- 6.9 Category 1 areas include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) (Natura 2000 sites) where development will only be permitted where an appropriate assessment of the proposal demonstrates that it will not adversely affect the integrity of the site following the implementation of any

- mitigation measures. The application site is not located within any Special Protection Area (SPA) and it is not of a size or scale that would have any effect outwith its application boundary.
- 6.10 Category 2 areas include Scheduled Monuments and their setting, Category A listed buildings and their setting, Gardens and Designed Landscapes and Historic Battlefields where development will be permitted where the objectives of the designation and the overall integrity of the area can be shown not to be compromised following the implementation of any mitigation measures. Category 3 areas include Category B and C listed buildings and their setting, non-scheduled archaeological sites and monuments and Conservation Areas where development which would affect these areas following the implementation of any mitigation measures will only be permitted where there is no significant adverse impact on the protected resource. Again, the size and scale of the proposals would not result in any impact outside the immediate area and there are no historic designations that would be affected by the proposals.
- 6.11 Special Landscape Areas (SLA) are included within category 3 local designations, however, the application site is not within any designated SLA. Category 3 local designations include peatland where development will only be supported where any significant adverse effects are clearly outweighed by significant social or economic benefits. It adds that renewable energy development will be assessed on the basis of the specific guidance on peat contained in the Renewable Energy Supplementary Guidance. The proposals do not involve the removal of any peat.
- 6.12 In terms of the policies in the SG, specifically Policy NHE 19, they state that development which will have an adverse effect on protected species following the implementation of any mitigation measures will not be permitted unless it can be justified in accordance with the relevant protected species legislation. An extended Phase 1 Habitat survey was carried out as part of the application submission and no evidence of protected species were found within the application site. The application site is on previously broken ground and it is considered that this would minimise any potential for it to be used as habitats for wildlife.
- 6.13 Policy 17, Water Environment and Flooding, states that any development proposal which will have a significant adverse impact on the water environment will not be permitted. The water environment is made up of groundwater, surface water and watercourses. The SG on Sustainable Development and Climate Change contains guidance on the water environment, and the water environment falls under category 2 national designations within Policy 15 of the SLLDP. The battery proposals would not have any impact on the water environment. South Lanarkshire Council's Transportation Flooding Team have no comments to make regarding the proposals.
- 6.14 SLLDP Policy 19 supports renewable energy developments where they meet relevant development management criteria set out within the Supplementary Guidance on Renewable Energy. These criteria generally relate to applications seeking to establish the principle of renewable energy development, however, in this case, the wind farm is an established feature. It is considered that the scale and size of the proposals and their location are acceptable in meeting the aims of Policy 19 and the associated SG.

6.15 In view of the above, it is, therefore, considered that the proposal accords with the policies in the adopted South Lanarkshire Local Development Plan and associated Supplementary Guidance. The proposed development would not have any adverse impact on the environment or road safety and is, therefore, acceptable. It is recommended that the Scottish Government be notified that the Council has no objections to the application.

7 Reason for Decision

7.1 The proposed installation of a battery storage facility together with associated infrastructure at an existing wind farm are considered acceptable; are not considered to have any significant, adverse impact within the surrounding area; and accord with National Policy and the relevant provisions of the Development Plan subject to the imposition of the attached, recommended environmental and transportation conditions.

Michael McGlynn Executive Director (Community and Enterprise Resources)

Date: 18 April 2019

Previous references

♦ None

List of background papers

- Scottish Government Consultation
- ► Scottish Government Consultation Plans and Supporting Information
- South Lanarkshire Local Development Plan 2015 (adopted)
- Proposed South Lanarkshire Development Plan 2
- Scottish Government Advert January 2019

Consultations

Roads Development Management Team	05.03.2019
Environmental Services	27.02.2019
WOSAS	18.02.2019
Countryside And Greenspace	15 03 2019

Contact for further information

If you would like to inspect the background papers or want further information, please contact:-

James Wright, Planning Officer, Montrose House, 154 Montrose Crescent, Hamilton, ML3 6LB

Phone: 01698 455903

Email: james.wright@southlanarkshire.gov.uk

Paper apart – Application number: P/19/0214

Proposed Conditions and reasons

01. Between the hours of 08:00 and 20:00 the measured noise rating level emitted from the facility (LAeq, 1hr) shall not exceed the pre-existing background noise level (LA90, 30min) by more than 4dB when measured in accordance with British Standard BS 4142:2014 - 'Method for Rating and Assessing Industrial and Commercial Sound' at the development, hereby approved. Between the hours of 20:00 and 08:00 the noise rating level emitted from the facility (LAeq, 15min) shall not exceed the pre-existing background noise level (LA90, 30min) by more than 4dB when measured in accordance with BS 4142:2014 at the development, hereby approved.

The internal noise levels from the facility shall comply with BS 8233:2014 'Guidance on Sound Insulation and Noise Reduction for Buildings' as follows:-The scheme shall ensure that;-

- a) The internal levels with windows open (or under exceptional circumstances closed) do not exceed an LAeq, 16hr of 40dB daytime (07:00 to 23:00).
- b) The internal levels with windows open (or under exceptional circumstances closed) do not exceed an LAeq, 8hr of 30dB night-time (23:00 to 07:00).
- c) The internal levels with windows open (or under exceptional circumstances closed) do not exceed an LA,max of 45dB night-time (23:00 to 07:00).
- D) The external shall not exceed an LAeq, 16hr of 50dB daytime (07:00 to 23:00) in any garden areas, when measured free-field.

Reason: In the interests of protecting residential amenity.

02. Before any work starts on site details of wheel cleaning facilities for construction traffic shall be submitted for the written approval of South Lanarkshire Council and will be implemented and maintained as such for the lifetime of the construction period as approved.

Reason: In the interests of road safety.

03. Before any work starts on site a site plan detailing staff parking and turning and loading areas shall be submitted for the written approval of South Lanarkshire Council. Once approved the staff parking and turning and loading areas shall be be implemented as approved and maintained as such for the lifetime of the development, hereby approved.

Reason: In the interests of road safety

04. Before any work starts on site, a Traffic Management Plan shall be submitted for the written approval of South Lanarkshire Council. For the avoidance of doubt the Traffic Management Plan shall detail, but not be limited to, predicted traffic volumes, vehicle routing for construction traffic and signage (both warning and directional) for the public road. Once approved the Traffic Management Plan shall

be fully implemented as approved and maintained as such for the lifetime of the development, hereby approved.

Reason: In the interests of road safety

05. All traffic shall access the site in a south bound direction from the Millwell Road and exit the site in a northbound direction to Millwell Road.

Reason: In the interests of road safety.

06. Before any work starts on site drawings detailing swept path analysis for construction traffic shall be submitted for the written approval of South Lanarkshire Council. Once approved any road requirements from the swept path analysis shall be implemented as approved and maintained as such for the construction period of the development, hereby approved.

Reason: In the interests of road safety

