



ARCUS

**NEILSTON GREENER GRID PARK
LAND OFF GLENIFFER ROAD, PAISLEY
DESIGN AND ACCESS STATEMENT**

JANUARY 2021



Statkraft



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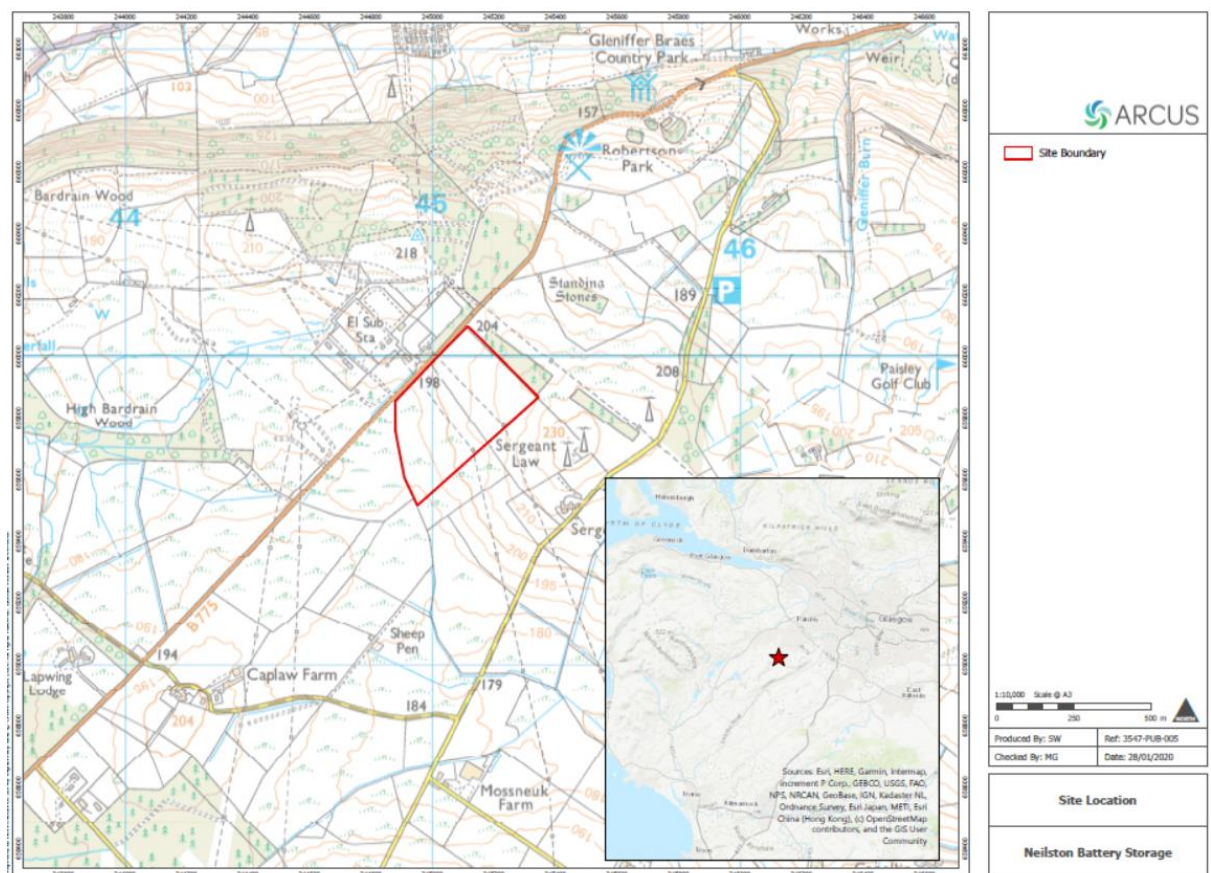
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1 INTRODUCTION

1.1 Background

This Design and Access Statement ('the DAS') has been prepared by Arcus Consultancy Services Ltd ('Arcus'), on behalf of Statkraft UK LTD ('the Applicant'), to accompany the planning application submitted to Renfrewshire Council ('the Council') for the development of a greener grid park ('the Development'), to support the flexible operation of National Grid and decarbonisation of electricity supply by balancing electricity supply and demand at land approximately 400m northwest of Sergeantlaw, off Gleniffer Road, Paisley; and opposite of the existing Neilston substation ('the Site'). The Planning Application boundary is made up of an area of approximately 14 hectares ('ha').

Figure 1: Site Location Plan



The Development will have a construction period of up to 24 months and the Applicant is seeking a permanent planning permission.

1.2 The Applicant

The Applicant is Statkraft UK LTD. Statkraft is Europe's largest generator of renewable energy; producing hydropower, wind power, solar power, battery storage, gas-fired power, and supplying district heating. Statkraft owns and operates 11 wind farms in the British Isles and the Nordics, with a combined installed capacity of almost 1,000 MW (1GW).

1.3 Role and Purpose

This DAS has been prepared in accordance with Regulation 13 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013¹ ('the DMP') which sets out the detailed requirements of the content of a DAS in relation to planning permission.

Regulation 2(1) of the Town and County Planning (Hierarchy of Developments) (Scotland) Regulations 2009 states that development will be classed as a "*major development*" where the applicable threshold in Schedule 1 of the Regulations is met or exceeded. In this instance, the proposal would be classified as 'Other Development', with the threshold for being considered a 'Major' development as where:

(a) *The gross floor space of any building, structure or erection constructed as a result of such development is or exceeds 5,000 square metres;*

or

(b) *The area of the site is or exceed 2 hectares.*

A DAS is required in this case as the Development would constitute 'major development', with the site area exceeding 2 hectares.

The requirements under Regulation 13 of the DMP cover both design and access, allowing Applicants to demonstrate an integrated approach that will deliver inclusive design, and address a full range of access requirements throughout the design process.

The DAS forms part of the planning application submission, which also comprises a Planning Statement and supporting technical appendices; planning drawings; planning application form/ownership certificate details; and the requisite planning fee.

The role and purpose of the DAS, in accordance with Regulation 13 of the DMP, is to:

- Explain the design principles and rationale that have been applied to the Development;
- Demonstrate the steps taken to appraise the context of the Development, and how the design of the Development takes that context into account;
- Explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account;
- State what, if any, consultation has been undertaken on issues relating to access to the Development and what account has been taken of the outcome of any such consultation; and
- Explain how any specific issues which might affect access to the Development have been addressed.

This DAS has also been prepared in accordance with guidance included within the Planning Circular 3/2013: Development Management Procedures ('the Circular') Part 3, 'Preparation of Statements', Paragraphs 3.23-3.30. This section sets out the requirements for what must be included within the contents of a DAS.

Paragraph 3.24 of the Circular states that:

"A design statement is a written statement about the design principles and concepts that have been applied to the development and which –

Explains the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account.

¹ Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (Online) Available at: <http://www.legislation.gov.uk/ssi/2013/155/regulation/13/made> (Accessed 19/11/2019)

Describes the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use.

States what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the development; and what account has been taken of the outcome of any such consultation'.

Paragraph 3.26 of the Circular states: A design and access statement must: 'Explain the policy or approach adopted as to access and how:

- (i) policies relating to such access in the development plan have been taken into account; and
- (ii) (any specific issues which might affect access to the development for disabled people have been addressed'. This should explain how the applicant's policy / approach adopted in relation to access fits into the design process and how this has been informed by any development plan policies relating to access issues.

This DAS is structured as follows:

- Section 2 – The Development;
- Section 3 – The Policy Context;
- Section 4 – The Design Statement;
- Section 5 – The Access Statement; and
- Section 6 – Conclusion.

2 THE DEVELOPMENT

2.1 Overview

The Applicant is seeking planning permission for the construction and operation of a Greener Grid Park.

The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply. The Development will store, import and export electricity but will not generate any additional electricity nor have any direct on-site emissions of CO₂.

2.2 Development Infrastructure

The Development will consist of the following components, as shown on the Site Layout Plan (Planning Drawing 2):

- 364 no. battery units (each 12.9 m x 2.44 m x 2.59 m) (Planning Drawing 5);
- 46 no. inverter units (each 6.1 m x 2.44 m x 2.59 m) (Planning Drawing 7);
- 14 no. transformers with 7.0 m high connecting bus bars (Planning Drawing 6);
- 7 no. LV switch houses (each 7.5 m x 9.1 m) (Planning Drawing 13);
- 7 no. fire wall (each 46.7 m x 0.5 m x 14 m);
- 28 no. E-House (each 20.7 m x 38.6 m x 10.0 m);
- 14 no. energy management system (each 20.7 m x 36.7 m x 10.0 m);
- 28 no. coolers (each 11.3 m x 2.4 m x 2.5 m) (Planning Drawing 10);
- 46 no. switchgears (each 12.2 m x 2.44 m x 3.0 m);
- 7 no. diesel generators (each 6.1 m x 3.6 m) (Planning Drawing 12);
- 7 no. comms house (each 12.19 m x 2.44 m x 2.59 m) (Planning Drawing 9);
- 14 no. disconnectors (each 2.2 m x 4.5 m);
- 6 no. security columns of 6 m in height with CCTV cameras (Planning Drawing 11) located at various points around the site boundary;
- Internal roads; and
- A 2.4 m palisade fence around the perimeter of the Site (Planning Drawings 3 and 4) and 3.4m high electric security fencing.

Most components of the development will be housed in steel container-style units, while the palisade fencing and electric fence not only provide security but will adhere to the aesthetic of industrial developments and matches the National Grid substation opposite the site. The appearance of the Development will be unobtrusive and in keeping with the existing industrial character of the area.

3 THE POLICY CONTEXT

3.1 Planning Policy Context

3.1.1 National Planning Framework 3

The National Planning Framework 3 ('NPF 3'), published in June 2014, provides a statutory framework for Scotland's long term spatial development. NPF 3 sets out the Scottish Government's spatial development priorities for the next 20 to 30 years and represents a clear vision of what is expected of the planning system and outcomes that it must deliver for the people of Scotland. Whilst it is not prescriptive, NPF 3 will form a material consideration when determining the applications for new energy developments.

Although NPF3 does not specifically address Greener Grid Parks, the Scottish Government "aims to ensure that all parts of Scotland make best use of their assets to build a sustainable future", as stated in paragraph 2.6, while paragraph 2.7 supports "emerging technologies for renewable energy". NPF3 establishes Scotland as a leader for renewable energy development and advises that onshore wind will continue to make a significant contribution to the diversification of the energy mix.

It is important to recognise that energy management and storage plays an invaluable role in the success of renewable energy. Being able to store and distribute energy as efficiently as possible is a key component to the ongoing success of the renewable energy industry.

3.1.2 Scottish Planning Policy

Scottish Planning Policy ('SPP') was published in June 2014; its purpose is to set out national planning policies that reflect priorities of the Scottish Ministers for operation of the planning system and the development and use of land through sustainable economic growth. SPP aims to promote a planning process that is consistent across Scotland but flexible enough to accommodate local circumstances. SPP demonstrates a commitment to sustainable growth through a balance of promoting development in the appropriate places.

SPP strongly promotes good quality design of development, from initial concept through to delivery. Specifically, for energy developments in sensitive areas, SPP recognises the need for significant protection through detailed and efficient design. Consideration to demonstrate that any significant effects on the qualities of sensitive areas can be substantially overcome by siting, good quality design and mitigation is required.

Scottish Government Policy is to generate the equivalent of 100% of Scotland's gross annual electricity consumption and the equivalent of 11% of Scotland's heat demand met from renewable sources and a further 500 MW of community and locally-owned renewable energy by 2020. Scottish Planning Policy supports the installation of a wide range of renewable energy technologies to achieve these targets.

3.1.3 Policy Description

3.1.3.1 Renfrewshire Local Development Plan (2014)

Formally adopted on 28th August 2014, the Renfrewshire Local Development Plan² ('RLDP') aims to represent the view of the Council, setting out policies and proposals that aim to facilitate sustainable growth and sustainable development in Renfrewshire over the next 10 years.

² Renfrewshire Council (2014) *Renfrewshire Local Development Plan* [online] Available at: http://www.renfrewshire.gov.uk/media/1546/Adopted-Renfrewshire-Local-Development-Plan---August-2014/pdf/Adopted_Local_Development_Plan_August_2014.pdf?m=1458234969273 (Accessed 25/11/2020)

The RLDP reflects the Scottish Government's core principles and objectives as expressed in the National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP) including:

- Building a low carbon economy;
- An increased emphasis on place making;
- Respecting and maximising environmental assets;
- A sustainable approach to growth and development; and
- Well-connected places.

The following policies outlined within the RLDP are considered to be of relevance to the Development with regards to design and access:

Policy I6 – Renewable and Low Carbon Energy Developments: This policy states that renewable and low carbon energy developments will be supported in principle where they are appropriate in terms of location, siting and design having regard to any individual or cumulative significant effects on:

- Local environment, landscape character, built, natural or cultural heritage;
- Amenity of existing or allocated uses;
- Visual amenity;
- Outdoor sport and recreation interest; and
- The safe and efficient use of the airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.

Any developments will be required to comply with the criteria in the New Development Supplementary Guidance.

The New Development Supplementary Guidance states that proposals for development need to ensure that significant visual intrusion within the landscape in terms of scale, location, design etc. has been minimised.

3.1.4 Policy Assessment

It is considered that the matter of effects on airports, flights, navigation and MoD surveillance is relevant to the development of onshore wind and is not a consideration for the development for a relatively low-grade Greener Grid Park.

As can be seen from the Council's pre-application and screening advice, visual impacts on amenity should be mitigated through appropriate screening and considered in the design of the Proposed Development. Following a landscape and visual site survey and assessment, a landscape planting plan has been produced and is submitted with this Application. This ensures that visual impacts are mitigated as far as reasonably practicable. Other aspects of design, including boundary treatment and the colour of the proposed infrastructure components have been used to reduce the visual impacts further.

The proximity of the Proposed Development to the existing Neilston substation ensures that the Site is congruous with the current landscape and surrounding use, as it would adhere to the setting as somewhat industrial and influenced by man-made infrastructure. Therefore, it is considered that the Development complies with I6.

4 THE DESIGN STATEMENT

4.1 Site Selection

The Development is located adjacent to the Neilston Substation, which is part of, and is operated by, the National Grid. Given the close proximity to the substation, lengthy transmission cables will not be required, ensuring efficient connection to the National Grid, minimising disturbance and costs. The substation is capable of accommodating the transfer of electricity to and from the Development at an acceptable cost which will provide valuable support to the grid, thus protecting local customers at times when high demand places stress on the local and wider electricity network. As a result of the close proximity to the substation, underground cables will avoid any major infrastructure, minimising connection and transmission costs. The small scale of the underground grid connection required will also significantly minimise construction-related disruption.

The other key criteria which have led to the Site being selected for the Greener Grid Park include:

- Character of Site and surrounding area
- Separation from residential properties;
- Topography;
- Ease of access to the site for construction;
- Lack of environmental constraints (e.g. ecological/landscape designations, flood risk, etc.)

Following consideration of the above factors and the existing infrastructure within the wider area, the selected site was identified as having excellent potential for development with minimal environmental impacts.

4.2 Rationale for the Development

Renewable technologies are intermittent as the amount of energy generated is dependent on weather conditions. It is therefore necessary to balance demand and supply in order to prevent shortages and blackouts, as experienced in the South East of England in August 2019.

As such, there is a growing demand by network operators for a broad range of services such as storage and management. The Development is designed to support the flexible operation of the National Grid and the decarbonisation of the electricity supply. More information regarding this can be found in Section 1.3 of the Planning Statement.

The use of the Development is intended to support Scottish Government's commitments to reduce emissions of greenhouse gas emissions to combat the effects of climate change.

The Renewable Energy Directive 2009/28/EC³ sets targets for Member States in respect of the use of energy from renewable resources. The UK's obligation is 15% of energy consumption from renewable energy resources by 2020.

The European Council 2030 Climate and Energy Framework⁴ has set a further target of at least a 40% reduction in greenhouse gas emissions by 2030. The target is binding and all Member States are required to participate in this effort to further combat climate change.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019⁵ sets a national target for net-zero emissions of 2045. Setting a 'carbon neutral', net-zero target of 2045

³ European Commission (2009) Directive 2009/28/EC of the European Parliament and of the Council [Online] Available at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:140:0016:0062:en:PDF> (Accessed 25/11/2020)

⁴ European Commission (2014) The European Council 2030 Climate and Energy Framework [Online] Available at: https://ec.europa.eu/clima/policies/strategies/2030_en#tab-0-1 (Accessed 25/11/2020)

⁵ Scottish Government (2019) Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 [Online] Available at: <http://www.legislation.gov.uk/asp/2019/15/contents/enacted> (Accessed 25/11/2020)

is ambitious and ahead of the rest of the United Kingdom's target of 2050. The Government has set ambitious targets for reduction of carbon emissions. Projects, such as the Development play a key role in aiding the decarbonisation of the energy sector.

4.3 The Site Context

The Site comprises of rough agricultural grazing land. Following a review of the Scotland's Soils: Soils Map⁶ which details the national scale land capability for agriculture, the Site is located within land classified partly as Class 4.1 and predominantly as Class 4.2 (land capable of producing a wide range of crops, primarily on grassland with short arable breaks of forage crops).

The Site is located at approximately 200 m above ordnance datum (AOD) and is situated on agricultural land which is used for grazing. The land has a gentle incline to the north of the Site.

The landscape of the Site and surrounding area comprises of simple land cover of rugged farmland, used for rough grazing, and coniferous, commercial forestry, and woodland and open grassland of the Gleniffer Braes Country Park to the north. The Site is bound to the west by Gleniffer Road, the entrance off which would be opposite the existing Neilston Substation.

The Site Layout is shown in Planning Drawing 2 accompanying the planning application.

4.4 Surrounding Land Use

The characteristic of the surrounding land use is defined by a very lightly settled scattering of residential properties and the adjacent substation infrastructure. Whilst the Site and surrounding areas are open in character, the Site and surrounding landscape are dominated by the presence of the Neilston Substation and associated infrastructure.

A more detailed description of the Site and its surroundings is included in the Landscape and Visual Appraisal at Appendix 1.

4.5 Site Design

An explanation of each design component is set out briefly below.

4.5.1 Use

The design rationale for the use relates to statutory requirements and the Applicant's aspirations to combat climate change and reduce carbon emissions. The use of the site will be for the development of a Greener Grid Park to support the flexible operation of National Grid and decarbonisation of electricity supply by balancing electricity supply and demand.

This desire for effective and efficient balancing of the grid network has facilitated the development and design of the technology present within the Development.

The relatively low-grade agricultural land classification and proximity to the Neilston Substation predicate the selection of the Site as suitable for the proposed use.

Under RLDP Policy I6, the type of development has in-principle support, subject to environmental consideration. Therefore, the Development is considered an appropriate use of the land.

4.5.2 Amount

The Development will consist of infrastructure to support the storage of electricity and the balancing of the grid network. The amount of infrastructure present on site directly links

⁶ Scotland's Soils (2017) Land Capability for Agriculture in Scotland [Online] Available at: http://map.environment.gov.scot/Soil_maps/?layer=5 (Accessed 30/11/20)

to the capacity to achieve this purpose. In proposing the Development, and with account to its proximity to the Neilston Substation, the amount of infrastructure present on Site is reflective of a fit for purpose approach to design, whereby the Applicant has determined the amount of infrastructure that can be included on the Site to best achieve and maximise its desired purpose.

The full list of infrastructure components is included at Section 2.2 of this Statement. This amount of infrastructure has been incorporated into the Site with regards to appropriate safety measures, separation distances and the ability to operate and maintain the Development.

The amount of infrastructure present on the Site has been determined through the following principles:

- Maximising the potential for electricity storage, balancing the grid network, and contributing to decarbonisation;
- Ensuring safe and fit for purpose operations; and
- Ensuring that it does not unduly impact on environmental factors.

4.5.3 Layout

The layout has been informed by a number of factors through the site selection and iterative design process. These include:

- Suitable access to the site;
- The avoidance of environmentally sensitive areas to reduce potential effects on ecological assets, flood risk, landscape and visual amenity;
- Potential to incorporate biodiversity and landscape mitigation; and
- Achievement of optimum equipment efficiency and energy outputs through effective orientation and positioning.

4.5.4 Scale

The dimensions of the development infrastructure are included at Section 2.2 of this Statement. Most of the infrastructure will be at or below the equivalent of one story and where the height exceeds this, it is necessitated by the technologies contained within.

The visual impact, with regards to the scale of the Development, is considered in the Landscape and Visual Appraisal accompanying the planning application.

4.5.5 Appearance

Most components of the development will be housed in steel container-style units, while the palisade and electric fencing will adhere to the aesthetic of industrial developments and match the existing fencing of the National Grid substation opposite the site. The appearance of the Development will be unobtrusive and in keeping with the existing industrial character of the area. The amount, layout, scale and appearance of the Development are considered to be design factors which determine the suitability of the Development. All of these have been considered and proposed with regards to RLDP policies determining the appropriateness of the design and the value of using design to mitigate against unacceptable environmental effects.

4.5.6 Landscaping

The landscape planting and mitigation measures include native species hedgerow planting across the boundary of the Site. Further details with regards to Landscaping are available in Appendix 1: Landscape and Visual Appraisal and the accompanying Landscape Planting Plan.

4.5.7 Hydrology

As per the accompanying Outline Sustainable Drainage Strategy, on-site containerised units will be raised via plinths so as best to achieve the drainage strategy.

Figure 2: Example Raised Container Units⁷



4.5.8 Ecology

Given the low ecological value of the Site, as determined by the accompanying Preliminary Ecological Appraisal, no ecological mitigation measures have been incorporated into the design.

4.5.9 Archaeology and Cultural Heritage

Whilst there are no listed buildings or other archaeological designations either on-site or impacted by the design of the Development, there is a circa World War 2 structure present on the site. The final design iteration has taken account of this and will not only maintain the structure in its entirety but will provide a development buffer around it to ensure that it is not impacted by the Development.

Under RLDP Policy I6, renewable and low carbon development should take account of, amongst others, landscape and visual impact, and impact on natural and built heritage. The principles demonstrated in Section 4.5.6 – 4.5.9 of this DAS demonstrate that ensuring appropriate levels of impact on these environmental features has been at the forefront of the design process.

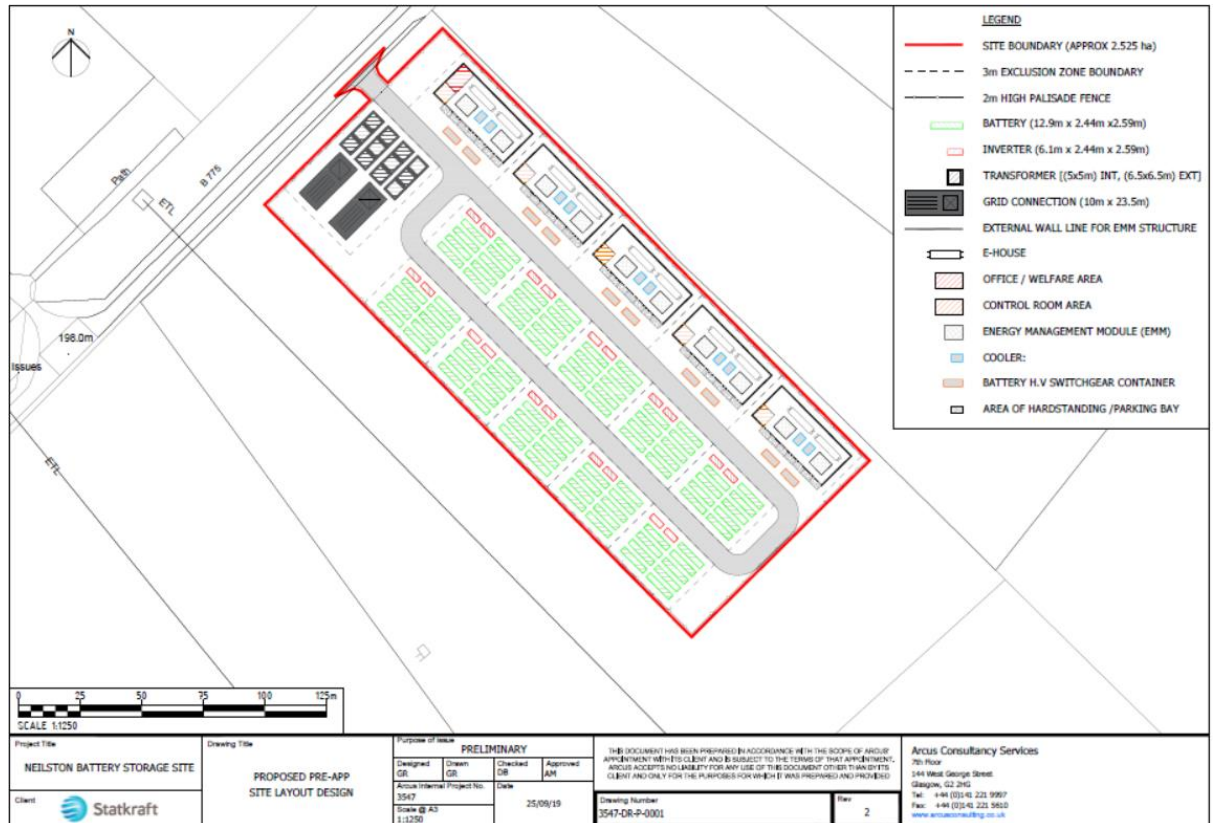
⁷ Philip Dennis Wholesaler Offices Battery Storage, Barnstaple (2018). [Online]. Available at: https://www.solarpowerportal.co.uk/news/tesla_and_anesco_batteries_combine_for_4mw_energy_storage_installs_at_food

4.6 Design Principles and Evolution

The following section highlights the design evolution with regards to how the Development achieved the final design iteration.

In October 2019, a Screening Request and Pre-Application Request was submitted to the Council for a smaller development on the Site.

Figure 3: Pre-application Layout

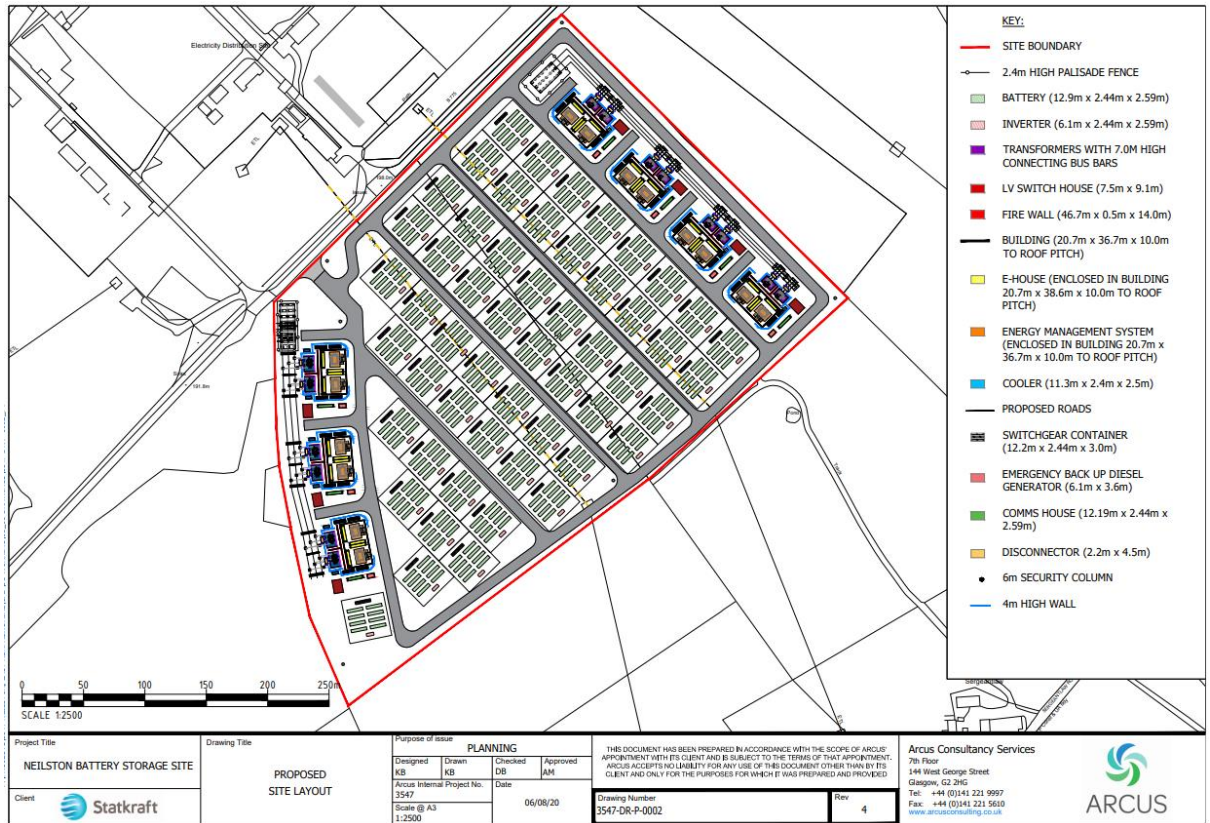


Whilst the initial Pre-Application and Screening Requests pertained to the smaller Site, the discussion with the Council included the potential for the Applicant to increase the Site area if it were deemed viable.

With regards to environmental assessments and the viability of the access point, along with the potential to increase energy storage for the purpose of achieving decarbonisation targets, the decision was made to increase the Site area.

In June 2020, the Applicant submitted a Proposal of Application Notice ('PAN') to the Council with the following proposed Site Layout Plan:

Figure 4: PAN Layout



This iteration of the Site Layout Plan maximised the Site for the purposes of increased energy storage and located the Site entrance further south on Gleniffer Road.

This layout was produced as part of the public consultation measures. Comments received during the consultation process regarding the design of the Development pertained to ensuring appropriate screening and minimising visual impact. Comments received did not require any alterations to the on-site infrastructure or its placement.

Following the consultation, and in preparation of submitting this Application, the Applicant was required to amend the Site Layout Plan to ensure that the internal tracks avoided the electricity pylons present on the southeast of the site.

Below is the finalised Site Layout Plan submitted with this Application:

Figure 5: Proposed Site Layout



The finalised layout has to viewed in concurrence with the submitted Landscape Planting Plan in order to consider the full screening measures and design mitigation. This layout provides the following components:

- Accessibility to all infrastructure during construction and operation;
- Avoidance of placing tracks under overhead lines;
- Suitable separation of infrastructure for safety and deliverability purposes;
- Optimised site access point;
- Containerised infrastructure;
- Suitable landscape screening to minimise environmental effects; and
- Site size with the greatest potential to provide greatest stability for electrical grid.

5 THE ACCESS STATEMENT

5.1 Route to Site

All traffic associated with the Development will access the site from Gleniffer Road (B775), which passes to the west of the site. Gleniffer Road becomes Stanely Road to the north, past Glenburn, on route to central Paisley.

Construction traffic is expected to arrive predominantly from the north initially via the A761. The detailed route from the A761 to the site will be as follows:

- Leave the A761 southbound on the B774.
- Continue south for approximately 275m before existing the junction right on to Calside.
- Continue on this road for approximately 5km, as it becomes Stanely Road and then Gleniffer Road.
- At this point, access to the Site will be on the left-hand side.

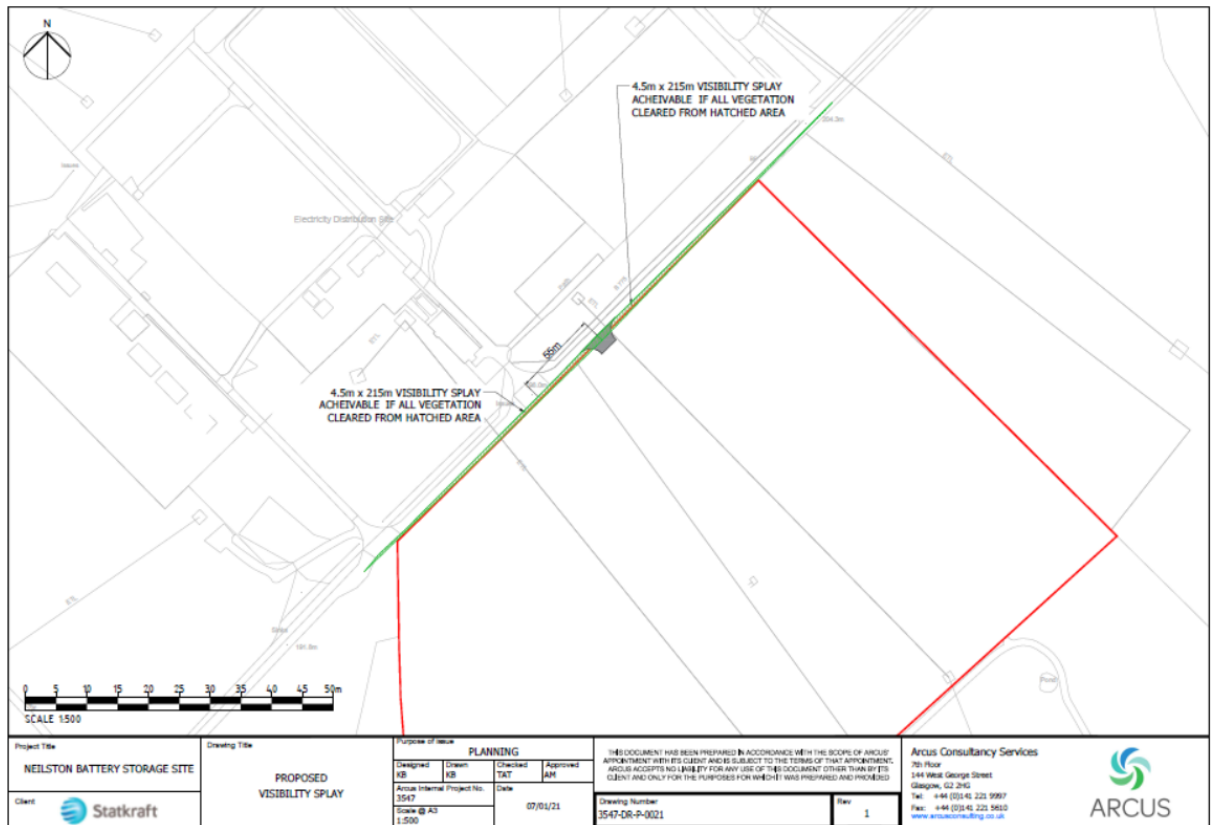
5.2 Site Entrance

All public roads along the route are at least 5 m wide. Road junctions and bends along the route have been assessed to ensure that vehicles will be able to negotiate these safely and enable easier access via larger vehicle such as HGV (length 16.5m, height 3.6m, width 2.5m) to the Site.

The presence of the Neilston Substation and its access point in particular restricts the position of the site entrance, as safety standards require the separation of entrances off the same road. As such the location of the site entrance has been produced with consideration to all relevant guidance, with the determination that the proposed entrance is the most suitable and viable access point.

The Site entrance point and visibility splays have been produced through consultation with the Council and are isolated in the figure below:

Figure 6: Site Entrance and Visibility Splays



5.3 Other Accesses

Whilst there is a private track that runs from Sargeantlaw Farm (southeast of the Site) to the Site boundary, this track will not have access to the site.

5.4 Construction Traffic Management Plan

A Construction Traffic Management Plan ('CTMP') will be prepared with traffic management measures which will ensure efficient and safe transport of vehicles and personnel to and from site, and with minimum disruption to other road users. It is anticipated that this will be enforced via a suitably worded planning condition. The CTMP will be submitted for approval by the Council Roads Department prior to the commencement of construction activity.

Following construction, once in full operation, the Development will not generate any significant traffic movements, with security and maintenance staff the only likely infrequent visitors, travelling by car or light van.

Pedestrian access will be restricted for security purposes to prevent theft and vandalism, and to ensure public safety.

5.5 Traffic Volume

The Development is expected to be constructed over 24 months in stages. Approximately 80 two-way (to and from the site) vehicle movements are expected to occur per week during this period for staff, and to deliver construction materials and components.

6 CONCLUSION

This DAS has been prepared in accordance with requirements of Regulation 13 of the DMP and the relevant LDP policies.

The DAS has established:

- The design principles and rationale that have been applied to the Development, including the various relevant environmental and technical criteria;
- The steps taken to appraise the context of the Site, and how the design of the Development takes that context into account, in respect of design iteration, the various relevant environmental and technical criteria, and each design component;
- The relevant considerations in forming the site access; and
- That all relevant issues which might affect access to the Development have been addressed.

The DAS has thus established that the Applicant can ably demonstrate an integrated approach that will deliver inclusive design, and address the full range of access requirements throughout the design process.