

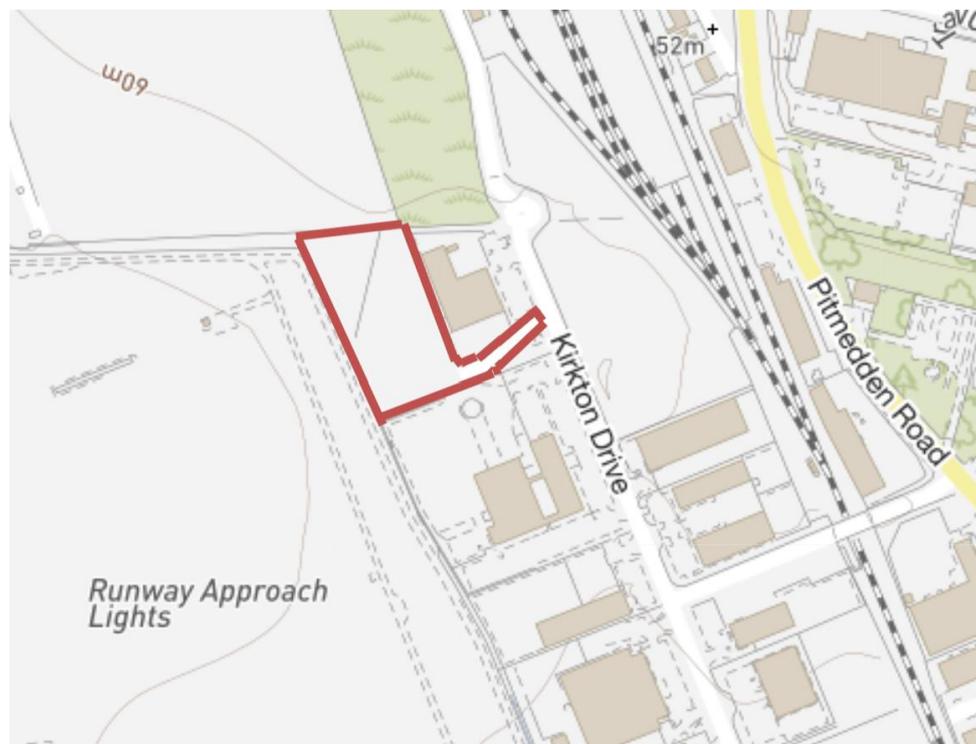


## Planning Development Management Committee

Report by Development Management Manager

**Committee Date: 26<sup>th</sup> May 2022**

Site Address:	Site North West of Helix House, Kirkton Drive, Dyce, AB21 0BG
Application Description:	Erection of energy storage facility including containers of batteries, power converters, transformers, stores, meter building, security, fencing and associated infrastructure
Application Ref:	220026/DPP
Application Type	Detailed Planning Permission
Application Date:	13 January 2022
Applicant:	Intelligent Land Investments Group Plc
Ward:	Dyce/Bucksburn/Danestone
Community Council:	Dyce And Stoneywood
Case Officer:	Lucy Greene



## **RECOMMENDATION**

Approve conditionally

## **APPLICATION BACKGROUND**

### **Site Description**

The 0.8ha site lies immediately to the east of the airport boundary fence and is currently covered by self seeded vegetation, with one or two larger trees within the site and a narrow tree belt which appears to be along the boundary and within the site to the south. The application site is within and on the north-western edge of the Airport East industrial area, zoned as 'B1' Business and Industrial in the Local Development Plan. A packaging manufacture and supply company occupy relatively new premises to the east of the site, whilst an offshore energy related company (Helix Well Ops) occupies the site to the south, with offices, workshops and outdoor equipment storage. The nearest residential buildings are houses just to the east of the railway line on Pitmedden Road (approximately 220m from edge of the site) and further houses more than 400 m to the north also on Pitmedden Road.

The site is within the middle zone of the INEOS Forties Pipeline consultation area and is not covered by any natural heritage designations.

### **Relevant Planning History**

211091/ESC – EIA Screening for Proposed grid battery energy storage facility with generation capacity up to 50 megawatts - Land at Raiths Industrial Estate by Kirkton Drive off Pitmedden Road Dyce. Confirmed EIA not required September 2021.

150002 - Formation of Office and Workshop Unit with associated car parking and yard area, Kirkton Drive Site 2, Phase 3 Dyce Aberdeen.

Approved conditionally March 2015 – not implemented and now lapsed.

## **APPLICATION DESCRIPTION**

### **Description of Proposal**

The proposal is to erect structures for the housing of energy storage batteries and associated equipment. Capacity of up to 49.9MW of energy storage would be provided. The batteries would be housed in steel shipping type containers, within these they would be stacked on racks. Fifty two (52 no.) containers (13m x 2.5m x 2.6m) are proposed, which together with transformers and converters, a sub-station and other ancillary equipment and buildings would be contained within a fenced compound. The banks of power converter cabinets, sited in front of the battery containers would switch between alternating and direct current and would have a height of up to 3.5m. Beside each power converter group would be a transformer, these would also have a height of stated as 3.5m at most. The submissions state that the standard container units shown in the application allow for final selection of internal equipment at a late stage, as battery technology is progressing rapidly. A prefabricated glass reinforced plastic (GRP) building (painted hollybush green) would be required to house the electricity meter, switchgear, control and health and safety equipment, sited at the SE corner of the site adjacent to the access. The site would be served by an existing shared vehicular access off Kirkton Drive.

The purpose of the facility would be to take excess power from the grid and store it, to then be fed back into the grid for use when needed. It is understood that the power would largely be from renewable energy sources which would otherwise be switched off when power is in excess of demand. The stored energy would not originate from the site.

The containers would be painted in hollybush green (BS 14-C-39).

The applicant states that the site has been selected as it is close to the Dyce grid supply point, which is approximately 800m to the west at Cothal View. This would be linked by a cable laid within the road.

## **Amendments**

None.

## **Supporting Documents**

All drawings and supporting documents listed below can be viewed on the Council's website at:

<https://publicaccess.aberdeencity.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=R5LO86BZJKN00>

The following Supporting Documents have been provided:

- Noise assessment
- Transport Statement
- Drainage Statement
- Landscape Plan
- Planning, Design and Access Statement
- Pre-Application Consultation Report
- Ecological Appraisal

## **Reason for Referral to Committee**

The application has been referred to the Planning Development Management Committee because it falls into the category of Major applications.

## **Pre-Application Consultation**

The applicant undertook statutory pre-application consultation which included an online public consultation event and provision of information online, which was advertised in the Press and Journal. The Dyce and Stoneywood Community Council and local Members were also notified. The applicant states that no adverse comments were received in respect of the proposals.

The applicant presented to the Council's Pre-Application Forum on 30<sup>th</sup> September 2021. Some discussion occurred regarding how the energy storage facility would operate and fire service access.

## **CONSULTATIONS**

**ACC - Roads Development Management Team** – Parking and access are acceptable. No objections.

**ACC - Environmental Health** – No observations. No impact on residential receptors.

**INEOS Forties Pipeline System** – Safety and integrity of the pipeline will not be affected by the proposed development.

**ACC - Waste and Recycling** – The development would receive a business waste collection, either from the Council or other providers. General information is provided.

**Aberdeen International Airport** – No objection, from a safeguarding perspective.

**Health and Safety Executive** – No objection.

**Dyce And Stoneywood Community Council** – No observations received.

## **REPRESENTATIONS**

One letter of objection was received, on behalf of the occupier of Helix House (to the south east of the site). This sets out the following:

- Application is contrary to policies B1: Business, B6: Pipelines, Major Hazards and Explosives storage Sites, D1: Quality placemaking by design, and R8: Renewable and Low Carbon Energy Developments; The neighbouring site contains a two storey office, workshop, warehouse and yard. A gantry crane extends from the workshop to a 900m<sup>3</sup> wet test tank on the site boundary adjacent to the application site, The objection states that there are 200 office staff and up to 50 people work in the yard;
- Queried whether the proposed use can be classed as low carbon energy;
- Risk of fire, site is unmanned;
- HSE have not issued detailed guidance for these facilities and this should be classed as a major hazard to which Policy B6 applies.
- The LDP (para. 3.74) requires consultation in areas around pipelines and hazardous sites. This should apply in reverse where a hazardous site is proposed. For developments near hazardous sites, the HSE advises that plans are drawn up including for evacuation of people in the surrounding area. A safety zone should be drawn around the proposed site, and that would result in the proposal not being located on the site in question, given the adjacent uses.
- The proposal should be located more remotely and the applicant has not considered alternatives;

A technical note from an insurer sets out site layout standards, however these are not possible, suggesting over development.

- No assessment of noise on occupiers of the objector's premises, which means that the proposal is contrary to Policy T5.

## **MATERIAL CONSIDERATIONS**

### **Legislative Requirements**

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that where, in making any determination under the planning acts, regard is to be had to the provisions of the Development Plan and that determination shall be made in accordance with the plan, so far as material to the application unless material considerations indicate otherwise.

## **National Planning Policy and Guidance**

Scottish Government's Scottish Energy Strategy, 2018 and Position Statement 2021  
Scotland's Climate Change Plan 2020  
Scottish Planning Policy (SPP)

## **Development Plan**

### Aberdeen City and Shire Strategic Development Plan (2020)

The current Strategic Development Plan for Aberdeen City and Shire was approved by Scottish Ministers in September 2020 and forms the strategic component of the Development Plan.

The SDP promotes renewable energy and notes the requirement to supply heat and power from renewable sources, as well as supporting reduced emissions from existing power stations. A more diverse mix of renewable energy sources, along with storage, will be needed if we are to meet Scottish Government renewables targets, make best use of the resources available, and ensure continuity of supply to serve communities and businesses across the City Region.

### Aberdeen Local Development Plan (2017)

Section 16 (1)(a)(ii) of the Town and Country Planning (Scotland) Act 1997 requires that, where there is a current local development plan, a proposed local development plan must be submitted to Scottish Ministers within 5 years after the date on which the current plan was approved. From 21 January 2022, the extant local development plan will be beyond this 5-year period. The Proposed Aberdeen Local Development Plan 2020 has been submitted to the Planning & Environmental Appeals Division at the Scottish Government in July 2021. The formal examination in public of the Proposed Local Development Plan 2020 has commenced with reporters appointed. Material consideration will be given to the Proposed Local Development Plan 2020, in the context of the progress of its examination, in the assessment of planning applications.

Given the extant local development plan is beyond its five-year review period consideration, where relevant, should be given to paragraph 33 of the Scottish Planning Policy (2014) which states: "Where relevant policies in a development plan are out-of-date or the plan does not contain policies relevant to the proposal, then the presumption in favour of development that contributes to sustainable development will be a significant material consideration.

The following policies are relevant –

#### Aberdeen Local Development Plan (2017)

- Policy B1: Business and Industrial Land
- Policy R8: Renewable and Low Carbon Energy Developments
- Policy B4: Aberdeen Airport
- Policy B6: Pipelines, Major Hazards and Explosives Storage Sites
- Policy D1: Quality Placemaking by Design
- Policy D2: Landscape
- Policy NE5: Trees
- Policy NE6: Flooding, Drainage and Water Quality
- Policy NE8: Natural Heritage
- Policy R7: Low and Zero Carbon Buildings, and Water Efficiency
- Policy T2: Managing the Transport Impact of Development
  - Policy T3: Sustainable and Active Travel
  - Policy T5: Noise
- Policy R2: Degraded and Contaminated Land

- Policy R6: Waste Management Requirements for New Development

### **Supplementary Guidance and Technical Advice Notes**

- Landscape
- Transport and Accessibility
- Noise
- Natural Heritage
- Flooding, Drainage and Water Quality
- Resources for New Development

### **Proposed Aberdeen Local Development Plan (2020)**

The Proposed Aberdeen Local Development Plan (Proposed ALDP) was approved at the Council meeting of 2 March 2020. A period of representation in public was undertaken from May to August 2020 and the Proposed ALDP has since been submitted to the Scottish Government Planning and Environmental Appeals Division for Examination in Public. The Proposed ALDP constitutes the Council's settled view as to what the final content of the next adopted ALDP should be and is now a material consideration in the determination of planning applications. The Aberdeen Local Development Plan 2017 will continue to be the primary document against which applications are considered. The exact weight to be given to matters contained in the Proposed ALDP (including individual policies) in relation to specific applications will depend on whether –

- such matters have or have not received representations as a result of the period of representations in public for the Proposed ALDP;
- the level of representations received in relation to relevant components of the Proposed ALDP and their relevance of these matters to the application under consideration.

The foregoing can only be assessed on a case-by-case basis.

The following policies are relevant –

- Policy B1: Business and Industry
- Policy WB3: Noise
- Policy NE2: Green and Blue Infrastructure
- Policy NE3: Our Natural Heritage
- Policy NE5: Trees and Woodland
- Policy D1: Quality Placemaking
- Policy D4: Landscape
- Policy R2: Degraded and Contaminated Land
- Policy R5: Waste Management Requirements for New Development
- Policy R7: Renewable and low carbon energy developments
- Policy T2: Transport
- Policy T3: Sustainable Transport
- Policy B3: Aberdeen International Airport and Perwinnes Radar
- Policy B6: Pipelines etc

## **EVALUATION**

### **Principle of Development**

The site is zoned as B1 (Business and Industrial Land) in the Aberdeen Local Development Plan 2017. Policy B1 retains land for office and industrial uses, including Class 4: Business, 5: General Industrial and Class 6: Storage and Distribution. Other uses suited to a business and industrial location will be considered on merit. It is stated that conditions may be imposed restricting levels of noise, hours of operation and external storage. The proposed use is similar to a storage and

distribution use in terms of its function, although would not involve the typical associated vehicular movements, so that in that respect it is less onerous on its surroundings.

In relation to noise an assessment was carried out and is submitted as part of the Supporting Statement. This notes that the environs of the application site is a relatively noisy environment, adjacent to the airport, within 200m of the railway and with significant noise from nearby roads. The noise assessment concludes that no mitigation measures are necessary in respect of nearby residential receptors, which lies around 250m to the north east, on the opposite side of the railway line. Environmental Health have considered the application and supporting documents and have no objection.

It is considered that the proposed use is acceptable in principle within an industrial area and in terms of noise, is acceptable at this particular location.

### Renewables and Energy Storage

The Scottish Government's Energy Strategy Position Statement (2021) and Scottish Planning Policy support the renewable energy system in a number of ways, including by encouraging grid connections which can help decentralise power systems across Scotland, noting the role and value of energy storage solutions where the grid is weak.

Policy R8: Renewable and Low Carbon Energy Developments supports in principle proposals for the development of renewable and low carbon energy schemes. The submissions describe how the proposal, whilst not exclusively for use in association with renewables, by its nature complements the generation of renewable energy by allowing it to be stored when generation is greater than need. Although the policy principally envisages renewable energy generating technologies it contains useful criteria for assessing schemes, indicating support where these involve technology operating efficiently and environmental and cumulative impacts are satisfactorily addressed. The criteria relate to: impact on the local environment, landscape and heritage; impact on air quality, tourism and residential amenity.

Impact on local environment: the proposal would be located within an industrial area on a site that is non-designated for natural heritage and had previously been largely cleared, although now contains self seeded species, including a mature silver birch tree. There are a number of small trees along the southern boundary and these would be retained and protected during development, although the centrally located silver birch would be removed. Surveys were carried out for badgers, bats and potential for breeding birds and it was found that the habitat is unsuitable for badgers and bats. Considering the location and nature of the site, it is considered that common species of birds may use the site for nesting and these are unlikely to include any threatened species. It is stated that if groundcover clearance occurs between April and August then a pre-construction breeding bird survey will be required. There were no plant species of note in terms of protection or significant botanical value.

Impact on Air Quality: there are no emissions from the proposed use.

Tourism: no impact; within an industrial area.

Impact on amenity of dwelling houses: no noise impact as noted above, and the site would not be readily visible from any houses.

The proposal would be consistent with the aims of the policy for renewable energy developments, although as noted above, is proposed as a complementary facility in order to allow optimisation of renewable energy.

The Scottish Government's Update to the Climate Change Plan 2018 – 2032 (published December 2020), states:

"We will review and publish an updated Electricity Generation Policy statement by 2022 reflecting the contribution that renewable electricity generation is likely to have to achieving our Net Zero target

in line with the Committee for Climate Change recommendation to do so. We will continue our efforts to ensure a sustainable security of electricity supply, and in 2021 we will launch a call for evidence and views on technologies including energy storage, smart grid technologies and technologies to deliver sustainable security of supply.” .

Although a report is not yet available on energy storage technology, it is clear from a number of sources that storage of renewable energy is an important element in working towards net zero. The proposal does not include the details of the technology to be used inside the storage containers proposed, however, it is considered the approval of this application would allow for the latest technology to be used. A condition would require the finalised details of the containers and other equipment, to be submitted when known and prior to development commencement.

### Fire Safety

The applicants also provided a response to the above and noted that the supplier and site operator (maintenance and servicing provider) will align to all relevant and current legislation and best practice for the design, construction and operation of the facility. A Fire Safety Management Procedure will be drawn up for the site. This can be submitted to and agreed in writing by the Planning Service by way of an appropriately worded planning condition.

### Natural Heritage, Landscaping and Design

For the reasons noted above, with conditions relating to tree protection and bird nesting, it is considered that the proposal would not impact significantly on natural heritage.

Meadow grass would be planted at the northern end of the site adjacent to the proposed balancing pond proposed as part of the surface water drainage works. The changes in levels required for development would be relatively minor, with the pond being located towards the lower end of the site.

The site lies within an industrial and business area and adjacent to the green belt to the north. As a number of the plans are of ‘typical’ details, it is considered acceptable to condition the details of those based on the overall height being no more than 3.5m as indicated in the submissions. The site is inconspicuous from public viewpoints, in addition it would include meadow planting to the northern end where the site abuts the green belt (albeit land adjacent to the airport runway). Overall it is considered there would be no adverse impact on visual amenity, and the wider landscape setting of the city.

### Flooding and Drainage

The site is not identified as being susceptible to flooding. Apart from the tarmac access, the track within the site would be formed from aggregate on permeable geotextile. In addition, the plans indicate space for a detention pond at the north end of the site. A condition is attached requiring a SUDS scheme to be submitted.

### Aberdeen Airport

The proposal has been subject to consultation with Aberdeen International Airport, the boundary of which is located immediately adjacent to the site to the west. There are no objections in terms of safeguarding and the Airport has not objected as a neighbour. The proposal would comply with the general provision of Policy B4 (Aberdeen Airport) of the ALDP.

### INEOS Pipeline

The proposal has also been the subject of consultation in respect of proximity to the INEOS pipeline and there was no objection.

Matters raised in objection

- Queried whether the proposed use can be classed as low carbon energy, as it does not create energy and there are no carbon reduction figures provided.  
*Response: although this type of large scale battery storage is relatively new and evolving technology, it is widely referred to (including within Scottish Government position statement) as a facility that is complementary to renewable energy. This is due to the nature of renewables with energy generation being linked to weather conditions for example, rather than demand.*
- Facilities of this kind carry risk of fire, which is difficult to control and is often left to burn out. This would be a danger to staff on the neighbouring site and the airport.
- The site is unmanned and this would result in delays before fires are reported. Multiple fire appliances would be required and it noted that is space to turn one appliance.  
*Response to two points above: the facility would provide storage for a maximum capacity of just under 50MW. For rough comparison a Tesla model S car battery has a capacity of 100kWh, so 50 MW storage is the equivalent of 500 electric cars, which also use Lithium-ion batteries. Domestic energy storage now generally uses Lithium-ion batteries in connection with photovoltaics. As this is relatively new technology also used (at smaller scale) within homes, a UK Government commissioned study was carried out in order to assess the safety of these and is informative as it looks more widely at the use of Lithium-ion battery energy storage, potential risks and the standards that cover both the batteries themselves and the storage systems. The report states that battery safety standards for industrial lithium-ion batteries include functional safety requirements, tests on a battery system level and a thermal runaway propagation test.*  
<https://www.gov.uk/government/publications/domestic-battery-energy-storage-systems>  
*It should however be noted that these matters are regulated outside the planning system and the operator as well as component manufacturers would be required to adhere to the standards as well as any requirements of insurance companies. It is not for the Planning Service to get involved in matters that are controlled by other legislation. Fire risk assessments would be required to be carried out and are enforceable by the Fire Service. The applicant has stated within the Supporting Statement that there would be liaison with the Fire Service over incident planning.*
- Policy B1: states that low amenity uses must have regard to surrounding uses and not adversely affect their amenity. Whilst paragraph 3.60 states they should be sensitively located.  
*Response: within this industrial and business site context, the proposal is considered not to be a low amenity use. Environmental Health confirm that noise levels from the facility at Helix House and Peak House offices, based on the NIA, are expected to be within the guidance levels for offices. Background noise levels here, adjacent to the airport, and nearby roads, would mask any noise emissions from the proposed facility. The northern end of the office building would be approximately 74m from the nearest battery storage container on site.*
- HSE have not issued detailed guidance for these facilities and this should be classed as a major hazard to which Policy B6 applies.
- The LDP (para. 3.74) requires consultation in areas around pipelines and hazardous sites. This should apply in reverse where a hazardous site is proposed. For developments near

hazardous sites, the HSE advises that plans are drawn up including for evacuation of people in the surrounding area. A safety zone should be drawn around the proposed site, and that would result in the proposal not being located on the site in question, given the adjacent uses.

*Response: the proposals do not fall within the scope of the HSE's Control of Major Accidents Hazards nor planning controls on hazardous substances. HSE were consulted on the planning application and the proposal was found to be in line with their PADHI guidance.*

- The proposal should be located more remotely and the applicant has not considered alternatives.

*Response: The storage needs to be co-located with a grid supply point. It is considered that the proposed use is appropriate within the industrial and business area proposed, relatively close to the grid connection point on the north eastern edge of Dyce.*

A generic technical note from an insurer is provided and this provides various suggestions, including installing battery storage a minimum of 20m from important buildings / equipment; 3m separation from public ways, installation of thermal barriers and sprinklers within containers. It appears that the proposal would not comply with these suggestions, suggesting this is over development.

*Response: The technical note consists of 'suggestions', is from an insurer rather than a statutory consultee and relates to the US. The applicant will be required to undertake a risk assessment including in relation to fire, which is enforceable by the Scottish Fire and Rescue Service and to comply with the requirements of any insurer.*

It appears that there has been no assessment of noise on occupiers of the objector's premises, which means that the proposal is contrary to Policy T5.

*Response: Noise is dealt with above. The objector's premises consisting of both office and workshop areas, is located within an area that is currently affected by a number of sources of noise, and is also allocated including industrial use within the extant and proposed LDPs.*

## **Proposed Aberdeen Local Development Plan**

In relation to this particular application, the policies in the Proposed Aberdeen Local Development Plan 2020 (PALDP) substantively reiterate those in the adopted Local Development Plan and the proposal is acceptable in terms of both Plans for the reasons previously given.

## **RECOMMENDATION**

Approve conditionally

## **REASON FOR RECOMMENDATION**

Information has been provided confirming that the proposed development would have no adverse impact on the character and amenity of the surrounding area. The proposed development is considered not to be a 'low amenity' bad neighbour use in this area and would therefore comply with Policy B1: Business and Industrial Land.

It is considered that the proposal would comply with Policy R8 (Renewable and Low Carbon Developments) of the ALDP in that the development will contribute to the development of renewable and low carbon energy schemes without any adverse environmental or cumulative impacts.

All other technical issues have been resolved or can be controlled via appropriately worded planning conditions. The proposal would therefore comply with Policies T2: Managing the Transport Impact of Development, T3: Sustainable and Active Travel, T5: Noise, B4: Aberdeen Airport, D2: Landscape, NE6: Flooding, Drainage and Water Quality, NE8: Natural Heritage and R6: Waste Management Requirements for New Development as well as with the associated Supplementary Guidance in relation to Landscape, Transport and Accessibility, Noise, Natural Heritage and Flooding, Drainage and Water Quality.

For similar reasons the proposal would also comply with Policies B1: Business and Industrial, WB3: Noise, Policy R7: Renewable and low carbon energy developments, B6 Pipelines, NE3: Our Natural Heritage, NE4: Our Water Environment, D1: Quality Placemaking, D4: Landscape, T2: Sustainable Transport, T3: Parking and B3: Aberdeen International Airport and Perwinnes Radar of the Proposed Aberdeen Local Development Plan.

There are no material planning considerations that would warrant refusal of planning permission in this instance.

## **CONDITIONS**

1. That in the event that any battery installed and commissioned fails to commercially operate as intended for a continuous period of six-months and there is no plan in place to bring the battery in to operation within a further period of six-months, then unless agreed in writing with the Planning Authority, the facility will be deemed to have ceased to be required. If deemed to have ceased to be required, the battery, battery storage container and its ancillary equipment will be dismantled and removed from the site, with the cells being appropriately disposed and/or recycled/ re-purposed, and the ground being re-instated to the specification and satisfaction of the Planning Authority by the operator within the following three-month period. Reason: to ensure that any redundant facilities are removed from the site, in the interests of safety, amenity and environmental protection.
2. That in the event of the development hereby approved not operating on a commercial basis to the grid network for a continuous period of 12 months, the company must immediately notify the Planning Authority in writing of the situation and shall, if directed by the Planning Authority decommission the development and reinstate the site to the specification and satisfaction of the Planning Authority. The Planning Authority shall have due regard to the circumstances surrounding the failure to store electricity. Reason: to ensure the decommissioning and removal of the development in an appropriate and environmentally acceptable manner and the restoration of the site. In the interests of safety, amenity and environmental protection.

3. That no development shall take place other than in accordance with the plans unless and until full details of the proposed battery storage containers (and ancillary infrastructure) hereby permitted has been submitted to and approved in writing by the Planning Authority. These details shall include:
  - (a) design, power rating, sound power level modelled at the most sensitive receptor (if deviating from the Noise Impact Assessment accompanying the application), layout and dimensions of the battery storage containers (and ancillary infrastructure) and the metering building to be installed.
  - (b) detailed site layout plan, including surfacing materials, boundary treatment, surface water drainage measures and planting.Thereafter, the battery storage containers and associated infrastructure shall be installed and operate in accordance with these approved details.

Reason: to protect the visual amenity of the area.
4. That no development shall commence until details of the final drainage design has been submitted to and approved in writing by the Planning Authority. The development shall be constructed in accordance with the approved details and thereafter maintained in perpetuity.

Reason: in order to ensure that the site is adequately drained.
5. That no trees shall be removed during the bird nesting season (beginning of April to end of August) unless there has been carried out a nesting bird survey by a suitably qualified specialist, and that specialist remains on site for the duration of the removal operation.

Reason: in the interests of the protection of breeding birds.
6. That no development shall take place unless tree protection fencing is in place on site. This shall be in accordance with a scheme that has been submitted to and approved in writing by the planning authority.

Reason: In the interests of biodiversity and visual amenity.
7. That no development shall commence until details of the final landscaping and drainage design has been submitted to and approved in writing by the Planning Authority. The development shall be constructed in accordance with the approved details and thereafter maintained in perpetuity. Reason: in order to ensure that the site is adequately drained.
8. That prior to the commencement of development, the Fire Safety Management Procedure shall be submitted to, and agreed in writing by the Planning Authority. Thereafter the plan shall be implemented and retained in perpetuity, unless otherwise agreed in writing by the Planning Authority. Reason: in the interests of fire safety and in the amenity of the surrounding area.