



STATERA
BALANCING THE GRID

East Claydon Battery Energy Storage System (BESS)

Addendum 2 to Planning Design and Access Statement

NPPF Comparative Analysis

January 2024

Overview

This addendum to the Planning Design and Access Statement covers changes to the National Planning Policy Framework (NPPF) which have been published following planning application submission.

Summary

The Statera planning application for a Battery Energy Storage System (BESS) was submitted to Buckinghamshire County Council on 11th December 2023 (planning ref: 23/03875/APP).

On 19th December 2023 the UK Government published an updated NPPF replacing the version issued in September 2023. The December version of the NPPF includes numerous policy and wording changes, mostly relating to the delivery of housing and mansard roofs.

In terms of changes relevant to the project, at a strategic level Paragraph 20 of the NPPF now seeks strategic policies that 'ensure outcomes which support beauty and placemaking', paragraph 96 of the NPPF also now echoes this updated wording and that policies and decisions should aim to achieve 'beautiful buildings'. The NPPF theme of achieving 'beautiful' places is also replicated again within Part 12.

Paragraph 140 seeks that planning conditions refer to clear and 'accurate plans and drawings which can provide visual clarity on the design of the development', the aim of which is to provide greater certainty for those implementing planning permissions and a clear basis of identifying any breaches of planning control.

Footnote 62 of the NPPF now includes additional wording that *"The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development"*.

No other NPPF policy changes of potential relevance to the project have been identified through our analysis.

It short, it should be noted that whilst the NPPF paragraph references within our submitted project documentation will now be different than those of the December 2023 NPPF, the thrust of policy as it relates to the project remains the same.

Annex A provides a table indicating changes to relevant policy references between the September and December 2023 versions of the NPPF, alongside policy wording changes (if relevant).

Annex A: Changes between September and December 2023 versions of NPPF

The below table provides an analysis of the changes made by the December 2023 NPPF and how these changes relate to submitted planning application documents.

23/03875/APP Location of reference within Document*	NPPF paragraph reference provided ¹	19/12/23 NPPF paragraph reference	Assessed Change to NPPF Text (September version vs December update) ²
Planning Design and Access Statement			
Planning Design and Access Statement, Paragraph 8.13	48(a)	48(a)	No material policy changes between versions.
Planning Design and Access Statement, Paragraph 8.90	Paragraph 7	Paragraph 7	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
Planning Design and Access Statement, Paragraph 8.91	Paragraph 8	Paragraph 8	No material policy changes between versions.
Planning Design and Access Statement, Paragraph 8.92	Paragraph 11	Paragraph 11	No material policy changes between versions.
Planning Design and Access Statement, Paragraph 8.93	Paragraph 12	Paragraph 12	No material policy changes between versions.
Planning Design and Access Statement, Paragraph 8.94	Paragraph 100	Paragraph 104	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.95	Paragraph 111	Paragraph 115	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.96	Paragraph 120	Paragraph 124	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.97	Paragraph 130	Paragraph 135	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.98	Paragraph 152	Paragraph 157	No material policy changes between versions.
Planning Design and Access	Paragraph 157	Paragraph 162	No material policy changes between versions.

¹ All of our application documents are based on 5th September 2023 version of the NPPF.

² Material changes are only identified for matters within the NPPF which may be relevant to BESS developments.

Statement Paragraph 8.99			
Planning Design and Access Statement Paragraph 8.100	Paragraph 158	Paragraph 163	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.101	Paragraph 159	Paragraph 165	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.102	Paragraph 167	Paragraph 173	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.103	Paragraph 174	Paragraph 180	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.104	Paragraph 180	Paragraph 186	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.105	Paragraph 185	Paragraph 191	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.106	Paragraph 194	Paragraph 200	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.107	Paragraph 202	Paragraph 207	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.108	Glossary of NPPF	Glossary of NPPF	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.109	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.111	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.3	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.4	Paragraph 155	Paragraph 160	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.4	Paragraph 152	Paragraph 157	No material policy changes between versions.

Planning Design and Access Statement Paragraph 8.4	Paragraph 120	Paragraph 124	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.4	Paragraph 130	Paragraph 135	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.11	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.19	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.32	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.40	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.52	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.62	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.63	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.68	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 8.73	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Paragraph 9.2	N/A	N/A	No material policy changes between versions.
Planning Design and Access Statement Addendum Paragraph 1.2.3	Page 70	Page 72	No material policy changes between versions.
ES Volume 1			
Environmental Statement Non-Technical Summary Section 2	N/A	N/A	No material policy changes between versions.

ES Vol 1 Chapter 4, Paragraph 1.3.2	Paragraph 7	Paragraph 7	No material policy changes between versions.
ES Volume 2			
ES Vol 2 Chapter Paragraph 2.1.1	N/A	N/A	No material policy changes between versions.
ES Vol 2 Chapter Paragraph 2.3.2	N/A	N/A	No material policy changes between versions.
ES Vol 2 Chapter Paragraph 9.3.29	N/A	N/A	No material policy changes between versions.
ES Vol 2 Chapter Paragraph 11.12	N/A	N/A	No material policy changes between versions.
ES Vol 2 Appendix C, Paragraph C1	N/A	N/A	No material policy changes between versions.
ES Vol 2 Appendix C, Paragraph C2	N/A	Paragraph 180	No material policy changes between versions.
ES Vol 2 Appendix C, Paragraph C4	N/A	Footnote 69	No material policy changes between versions.
ES Vol 2 Appendix C, Paragraph C8	N/A	N/A	No material policy changes between versions.
ES Vol 2 Appendix C Paragraph C10	N/A	N/A	No material policy changes between versions.
ES Vol 2 Appendix C Paragraph C13	N/A	N/A	No material policy changes between versions.
ES Vol 2 Appendix C Paragraph C15	N/A	N/A	No material policy changes between versions.
ES Volume 3			
ES Vol 3 Chapter Paragraph 2.1.1	Section 15	Section 15	No material policy changes between versions.
ES Vol 3 Chapter Paragraph 2.1.2	Paragraph 174	Paragraph 180	No material policy changes between versions.
ES Vol 3 Chapter Paragraph 2.1.3	Paragraph 180	Paragraph 186	No material policy changes between versions.
ES Vol 3 Appendix 2 Page 7	N/A	N/A	No other material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 2 Page 27	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 2 Page 28	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 2 Page 39	N/A	N/A	No other material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 2 Page 40	174 - 188	180 - 194	Footnote 62 of the NPPF now includes additional wording that <i>“The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development”</i> . No other material policy changes.
ES Vol 3 Appendix 3 Page 6	N/A	N/A	No other material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 3 Page 29	N/A	N/A	No material policy changes between versions.

ES Vol 3 Appendix 3 Page 36	174 - 188	180 - 194	Footnote 62 of the NPPF now includes additional wording that <i>“The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development”</i> . No other material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 4 Page 5	N/A	N/A	No other material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 4 Page 15	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 4 Page 19	174 - 188	180 - 194	Footnote 62 of the NPPF now includes additional wording that <i>“The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development”</i> . No other material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 4 Page 29	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 4 Page 36	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 5 Page 6	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 5 Page 22	174 - 182	180 - 186	Footnote 62 of the NPPF now includes additional wording that <i>“The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development”</i> . No other material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 7, Appendix A	N/A	N/A	No material policy changes albeit text reference should now be <i>“National Planning Policy Framework (December 2023) (NPPF)”</i> .
ES Vol 3 Appendix 6 Page 8	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 6 Page 28	N/A	N/A	No material policy changes between versions.
ES Vol 3 Appendix 6 Page 34	174 - 188	180 - 194	Footnote 62 of the NPPF now includes additional wording that <i>“The availability of agricultural land used for food production should be considered, alongside the other</i>

			<p>policies in this Framework, when deciding what sites are most appropriate for development”.</p> <p>No other material policy changes albeit text reference should now be “<i>National Planning Policy Framework (December 2023) (NPPF)</i>”.</p>
ES Volume 4			
ES Vol 4 Chapter Paragraph 2.2.1	N/A	N/A	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Vol 4 Chapter Paragraph 2.2.2	Section 14	Section 14	No material policy changes between versions.
ES Vol 4 Chapter Paragraph 2.2.2	N/A	N/A	No material policy changes between versions.
ES Vol 4 Chapter Paragraph 2.2.4	Footnote 55	Footnote 59	No material policy changes between versions.
ES Vol 4 Chapter Paragraph 2.2.5	N/A	N/A	No material policy changes between versions.
ES Vol 4 Chapter Paragraph 2.2.13	N/A	N/A	No material policy changes between versions.
ES Vol 4 Chapter Paragraph 2.2.14	N/A	N/A	No material policy changes between versions.
ES Vol 4 Chapter Paragraph 8.2.1	N/A	N/A	No material policy changes between versions.
ES Vol 4 Chapter Paragraph 8.3.1	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 1.1	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 1.2	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 1.5	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph Table 1	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 2.3	N/A	N/A	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Vol 4 Appendix 4.1 Paragraph 2.4	Section 14	Section 14	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 2.5	Section 14	Section 14	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 2.6	Footnote 55	Footnote 59	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 2.7	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 2.14	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 2.15	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraphs 7.4 – 7.6	N/A	N/A	No material policy changes between versions.

ES Vol 4 Appendix 4.1 Paragraphs 7.4 – 8.5	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 9.1	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 9.6	N/A	N/A	No material policy changes between versions.
ES Vol 4 Appendix 4.1 Paragraph 9.11	N/A	N/A	No material policy changes between versions.
ES Volume 5			
ES Vol 5 Chapter Paragraph 5.2.1	Paragraph 8	Paragraph 8	No material policy changes between versions.
ES Vol 5 Chapter Paragraph 5.2.1	N/A	N/A	No material policy changes between versions.
ES Vol 5 Chapter Paragraph 5.2.2	Sections 14 - 15	Sections 14 - 15	No material policy changes between versions.
ES Vol 5 Chapter Paragraph 5.2.3	Paragraph 152	Paragraph 157	No material policy changes between versions.
ES Vol 5 Chapter Paragraph 5.2.4	Paragraph 158	Paragraph 163	No material policy changes between versions.
ES Vol 5 Chapter Paragraph 5.2.5	Paragraph 174	Paragraph 180	No material policy changes between versions.
ES Vol 5 Chapter Paragraph 5.2.6	Section 16	Section 16	No material policy changes between versions.
ES Vol 5 Chapter Paragraph 5.2.18	N/A	N/A	No material policy changes between versions.
ES Vol 5 Chapter Section 5.12	N/A	N/A	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Volume 6			
ES Vol 6 Chapter Paragraph 2.1.1	Paragraph 189	Paragraph 195	No material policy changes between versions.
ES Vol 6 Chapter Paragraph 2.1.2	Paragraph 129	Paragraph 201	No material policy changes between versions.
ES Vol 6 Chapter Paragraph 2.1.3	Paragraph 141	Paragraph 211	No material policy changes between versions.
ES Vol 6 Chapter Paragraph 2.1.4	Section 12	Section 16	No material policy changes between versions.
ES Vol 6 Chapter Paragraph 3.2.3	N/A	N/A	No material policy changes between versions.
ES Vol 6 Chapter Paragraph 3.4.1	N/A	N/A	No material policy changes between versions.
ES Vol 6 Chapter Paragraph 3.5.2	N/A	N/A	No material policy changes between versions.
ES Vol 6 Chapter Paragraph 3.5.3	N/A	N/A	No material policy changes between versions.
ES Volume 7			
ES Vol 7 Chapter Paragraph 2.1.1	Paragraph 189	Paragraph 195	No material policy changes between versions.
ES Vol 7 Chapter Paragraph 2.1.2	Paragraph 195	Paragraph 201	No material policy changes between versions.
ES Vol 7 Chapter Paragraph 2.1.3	Paragraph 193	Paragraph 211	No material policy changes between versions.
ES Vol 7 Chapter Paragraph 2.1.4	Section 16	Section 16	No material policy changes between versions.
ES Vol 7 Chapter Paragraph 3.2.4	N/A	N/A	No material policy changes between versions.

ES Vol 7 Chapter Paragraph 3.4.11	N/A	N/A	No material policy changes between versions.
ES Vol 7 Appendix 7.1 Section 1.1	Paragraph 203	Paragraph 209	No material policy changes between versions.
ES Vol 7 Appendix 7.1 Section 1.1	N/A	N/A	No material policy changes between versions.
ES Vol 7 Appendix 7.1 Section 3.3	Glossary	Glossary	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Vol 7 Appendix 7.1 Appendix 1	Paragraph 189	Paragraph 195	No material policy changes between versions.
ES Vol 7 Appendix 7.1 Appendix 1	Paragraph 194	Paragraph 200	No material policy changes between versions.
ES Vol 7 Appendix 7.1 Appendix 1	Paragraph 195	Paragraph 201	No material policy changes between versions.
ES Vol 7 Appendix 7.1 Appendix 1	Paragraph 199	Paragraph 205	No material policy changes between versions.
ES Vol 7 Appendix 7.1 Appendix 1	Paragraph 203	Paragraph 209	No material policy changes between versions.
ES Volume 8			
ES Vol 8 Paragraph 1.1.6	N/A	N/A	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Volume 9			
ES Vol 9 Chapter Paragraph 2.1.2	N/A	N/A	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Vol 9 Chapter Paragraph 2.1.3	Paragraph 152	Paragraph 157	No material policy changes between versions.
ES Vol 9 Chapter 6.2.23	N/A	N/A	No material policy changes between versions.
ES Vol 9 Appendix 9.1 Paragraph 1.1.1	N/A	N/A	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Vol 9 Appendix 9.1 Paragraph 1.1.2	Paragraph 152	Paragraph 157	No material policy changes between versions.
ES Volume 10			
ES Vol 10 Chapter Paragraph 1.2.1	N/A	N/A	No material policy changes albeit text reference should now be “ <i>National Planning Policy Framework (December 2023) (NPPF)</i> ”.
ES Vol 10 Chapter Paragraph 1.2.2	Paragraph 174	Paragraph 180	No material policy changes between versions.
ES Vol 10 Chapter Paragraph 1.2.3	Paragraph 183	Paragraph 189	No material policy changes between versions.
ES Vol 10 Chapter Paragraph 1.2.4	Paragraph 184	Paragraph 190	No material policy changes between versions.
ES Vol 10 Chapter Paragraph 1.2.5	Paragraph 185	Paragraph 191	No material policy changes between versions.
ES Vol 10 Chapter Paragraph 1.2.6	Paragraph 174	Paragraph 180	No material policy changes between versions.
ES Vol 10 Chapter Paragraph 1.2.7	Annex 2	Annex 2	No material policy changes between versions.

ES Vol 10 Chapter Paragraph 1.2.8	Paragraph 175	Paragraph 181	No material policy changes between versions.
ES Volume 11			
ES Vol 11 Chapter Paragraph 1.3.7	Footnote 58	Footnote 62	Footnote 62 of the NPPF now includes additional wording that <i>“The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development”</i> .

*Reference made to the NPPF within local policy documents or in correspondence with stakeholders has been carried across verbatim into application submission documents. These references are quotes or extracts from external parties and are therefore not included within the Annex A comparative assessment.

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