

19/10/2026

Kirklees Metropolitan Council  
Planning Services,  
PO Box 1720,  
HUDDERSFIELD,  
HD1 9EL

Dear Sir / Madam,

## Discharge of Condition 24 - CCTV Strategy

**Planning permission:** 2021/62/93644/E, dated 24<sup>th</sup> August 2022

**Site:** Low Farm, Wakefield Road, Flockton, Huddersfield, WF4 4BB

**Development:** Erection and operation of grid-connected solar photovoltaic farm to supply up to 49.9MW, with ancillary infrastructure and landscaping and biodiversity enhancements.

**Applicant:** Low Farm Solar Project Limited

We write in respect of the above planning permission to request the discharge of Condition 24, which requires a CCTV strategy detailing the exact location, specification and height of the proposed CCTV equipment to be submitted to and approved in writing by the Local Planning Authority prior to installation.

The development comprises two areas. The "Solar Area" comprises the solar photovoltaic arrays and their ancillary infrastructure. The "DNO area" comprises the 132kV substation compound (including any control building within it) through which the development will connect to the distribution network, and which will be adopted and operated by Northern Powergrid as distribution network operator (DNO). The CCTV Strategy in this letter relates to the Solar Area. Security provisions in the DNO area are addressed in section 4.

This letter, together with the drawings and product information listed in the schedule at the end of this letter, comprises the CCTV Strategy for the Solar Area. The system has been designed and specified by GB Security Group (GBSG).

### 1. Location of the proposed equipment within Solar Area

The exact location of every item of equipment is shown on the enclosed site-specific CCTV layout plan. Please note the final CCTV equipment and configuration will remain subject to the equipment available at final procurement. In summary the scheme comprises:

- 12 x PTZ Camera
- 52 x Hikvision IP Thermal Bullet Camera – 3mm – Indicating a visual range not exceeding 39m
- 151 x Hikvision Thermal IP Camera – 10mm – Indicating a visual range not exceeding 80m
- 13 x Magnetic Security Gate Contact
- 9 x Remote Keypad
- 71 x Master Poles
- 2 x CCTV Control Cabinet
- 71 x Node Cabinets

All posts are set immediately adjacent to, and inside, the approved perimeter fence line so that they read as part of the fence rather than as free-standing structures in the wider landscape. No posts or cabinets are proposed outside the fenced Solar Area, and no equipment is proposed on land in open countryside beyond the site. Cameras are oriented inwards and along the fence line, and all cabling is installed underground in ducting, so no additional poles, gantries or overhead lines are required.

## 2. Specification and height

The specification and height of each item is set out below and detailed on the enclosed drawings.

| Item                                 | Specification                                                                                                                                                                                                                                                                                                                                                                                                                             | Height / dimensions                                             |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| Camera posts (master and slave)      | Hot dip galvanised steel post, direct buried in C20 concrete foundation (1.0m deep, 0.3m diameter). Structural steelwork to BS EN 10210-1:1994 and BS EN 10210-2:1997; general steelwork to BS 1449:1991 and BS 1387:1985 / BS EN 10025:1993; galvanising to BS EN ISO 1461:2009; wind loading to CP3 Chapter V Part 2 and BS 6399 Part 2:1997. Optional matt finish available in the BS 4800 / RAL range. Refer to drawing GB-SD-101-V3. | 4.2m above ground level. No above ground foundation or plinth.  |
| Thermal IP bullet cameras (3mm lens) | Hikvision thermal IP bullet camera, fixed, post mounted. Thermal detection; no illumination or infra-red floodlighting required.                                                                                                                                                                                                                                                                                                          | Mounted at post head, 4.2m. Detection range not exceeding 39m.  |
| Thermal IP cameras (10mm lens)       | Hikvision thermal IP camera, fixed, post mounted, aligned along the fence line to provide curtain detection (refer to drawing GB-SD-107).                                                                                                                                                                                                                                                                                                 | Mounted at post head, 4.2m. Detection range not exceeding 80m.  |
| PTZ cameras                          | Pan, tilt and zoom camera for verification of activations at gates and access points only.                                                                                                                                                                                                                                                                                                                                                | Mounted at post head, 4.2m.                                     |
| Node cabinets                        | GRP enclosure, post mounted, housing PoE network switch, PSU, isolator and terminals (refer to drawing GB-SD-111).                                                                                                                                                                                                                                                                                                                        | 500mm high x 400mm wide, mounted on the post below camera head. |
| UPS cabinets                         | GRP enclosure on concrete base, housing UPS, battery and distribution (refer to drawing GB-SD-141-V4).                                                                                                                                                                                                                                                                                                                                    | 1,210mm high x 1,215mm wide x 520mm deep.                       |
| CCTV control cabinet                 | Internal rack mounted equipment housing NVR, fibre patch panel and router (refer to drawing GB-SD-215).                                                                                                                                                                                                                                                                                                                                   | Located internally; no external visual presence.                |
| Ancillary equipment                  | Magnetic gate contacts, remote keypads at access points, and PA speakers where shown.                                                                                                                                                                                                                                                                                                                                                     | Fixed to gates and gate posts at up to 1.5m.                    |
| Cabling                              | All power and fibre cabling installed underground in ducting and jointing chambers (refer to drawings GB-SD-106, GB-SD-109 and GB-SD-144). No overhead lines or poles for cabling.                                                                                                                                                                                                                                                        | Below ground.                                                   |

The tallest element of the system is the camera post at 4.2m above ground level. Camera heads are mounted at the head of the post and do not project above it. No item of CCTV equipment exceeds this height.

## 3. Balance between security and equipment in the Green Belt

The system has been designed to deliver perimeter security using the minimum quantity of above ground equipment. Three features of the design are relevant to the reason for the condition:

- The cameras are thermal detection units, which operate in complete darkness. The Solar Area scheme therefore requires no external lighting.
- Thermal cameras with a 10mm lens achieve detection ranges of up to 80m, allowing a comparatively small number of posts to cover a long perimeter and avoiding a proliferation of shorter-range equipment.
- All control, power and communications equipment are consolidated into a small number of cabinets and so far as possible, housed internally, rather than being distributed across the site.

The posts are slim galvanised sections read against an existing fence line and against a backdrop of vegetation and site infrastructure. They are visually recessive, contain no solid mass and have no above ground foundation, so their effect on the openness of the Green Belt is negligible. If the Local Planning Authority would prefer, the posts and cabinets can be finished in a matt recessive colour from the BS 4800 / RAL range to match the colour approved for the containers and temporary structures on site, and we would be content for this to be secured as part of the approved details.

The Solar Area strategy accordingly strikes the balance sought by Condition 24 between the security of the site and preventing an inundation of equipment within the Green Belt and accords with Policy LP26 of the Kirklees Local Plan and Chapters 13 and 14 of the National Planning Policy Framework.

#### **4. DNO area – Northern Powergrid substation**

The CCTV scheme described in sections 1 to 3 above relates to the Solar Area. Security within the DNO area is determined by Northern Powergrid rather than by the solar developer, and the detailed design of the DNO area is not yet confirmed. This section sets out the framework within which its security provisions will be determined.

The 132kV substation compound will be adopted and operated by Northern Powergrid. Northern Powergrid's policies set the security provisions that the substation design must adhere to, so that Northern Powergrid will meet its duties under the Electricity Safety, Quality and Continuity Regulations 2002 and the Occupiers' Liability Act 1996. The security provisions within the DNO area are therefore an operational requirement of the network operator rather than a discretionary feature of the solar development.

Northern Powergrid's policy IMP/002, Policy for Security Measures at Major Operational Sites (Version 1.1, February 2005) sets the minimum-security provisions for new major substations, which include primary substations, supply points and grid supply points. These minimum provisions include:

- a secure / statutory boundary at least 2.4m high, formed of an unclimbable building, wall or fence, to meet Regulation 11b of the Electricity Safety, Quality and Continuity Regulations 2002;
- safety signs and property notices at each entrance, with additional warning signs on the security fence, and locked gates at all access points; and
- an intruder detection system covering the substation building, which initiates a local audible alarm and sends a remote alarm to Northern Powergrid's central monitoring point, normally its Control Centre.

The policy also provides for enhanced security measures, determined by a risk assessment of the individual site (low, medium or high) and the substation type. These may include a pulse electrified fence, which reports interference remotely and activates the compound lighting. For CCTV and public address (PA) systems, the policy provides that they are not specified at indoor substations or at outdoor substations up to 66kV, but are specified at outdoor 132kV open busbar substations assessed as medium or high risk. Where CCTV is installed, the policy requires that:

- cameras are of static design and provide a colour picture at a remote central monitoring point;

- all parts of the compound, and all entrance doors and gates, can be viewed clearly;
- activation of the intruder alarm automatically brings up and records the camera covering the zone concerned;
- camera towers are positioned so as not to infringe safety clearances from operational equipment and are not positioned within two metres of the secure / statutory boundary; and
- consideration is given to a PA system, and permanent vandal-resistant labels warn of the presence of the security system.

Northern Powergrid's design guidance for primary and supply point substations (NSP/007/011, Guidance on Substation Design: Heating, Lighting and LV Supplies for a primary Substation, Version 2.0, May 2025) identifies the following further security-related provisions for substations:

- an intruder alarm system (Mission III), provided by Northern Powergrid's nominated supplier, with a dedicated electrical supply and space reserved inside the main access door for the alarm keypad and associated equipment;
- a fire detection system in line with BS 5839-1, with the facility to notify the Northern Powergrid control centre via the substation SCADA system; and
- a dedicated supply for electrified fencing, where this is provided.

The substation type and risk rating for the DNO area have not yet been confirmed, and the extent to which these provisions will be required, including whether CCTV is needed, will be determined by Northern Powergrid. No CCTV equipment within the DNO area forms part of this submission. Any CCTV in the DNO area would be specified to Northern Powergrid's requirements, which differ in some respects from the Solar Area scheme described above, and should any be required its exact location, specification and height will be submitted to the Local Planning Authority for approval prior to installation, in accordance with Condition 24.

## 5. Installation

The CCTV will be installed in accordance with the approved details. No CCTV equipment, including posts, will be installed in either the Solar Area or the DNO area other than as shown on the approved drawings without the prior written approval of the Local Planning Authority.

## 6. Request

We respectfully request written confirmation that Condition 24 is discharged in respect of the Solar Area, based on the CCTV Strategy set out in this letter and the enclosed drawings and product information. Any CCTV equipment within the DNO area will be the subject of a further submission, as set out in section 4. Please contact me using the details below should any further information be required.

## Schedule of enclosed drawings and documents

| Drawing / document | Content for solar area only                                                                                                                                                                                 |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CCTV_Layout_LF     | Site specific CCTV layout plan showing the exact location of every post, camera, node cabinet, UPS cabinet, control cabinet, gate contact and keypad, together with camera orientation and detection ranges |
| GB-SD-101-V3       | Standard 4.2m galvanised direct buried CCTV post construction drawing                                                                                                                                       |
| GB-SD-107          | CCTV curtain detection diagram                                                                                                                                                                              |

| Drawing / document    | Content for solar area only          |
|-----------------------|--------------------------------------|
| GB-SD-111 / GB-SD-112 | Node cabinet and node cabinet wiring |
| GB-SD-141-V4          | External UPS cabinet                 |
| GB-SD-215             | Main CCTV control cabinet with UPS   |
| GB-SD-106 / 109 / 144 | Trench, manhole and ducting details  |
| GB-SD-148             | Camera visibility example            |

Yours faithfully,

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