Our Ref: 2703-02/BH/JM

25 August 2023

Development Management
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

Dear Sir/ Madam

PROPOSED DEVELOPMENT OF A GRID CONNECTION CABLE ROUTE BETWEEEN THE APPROVED MINETY BATTERY STORAGE FACILITY (PLANNING REF: 20/07390/FUL) AND NATIONAL GRID'S MINETY SUBSTATION, MALMESBURY, SN16 9DX

We hereby apply, on behalf of HB411MIN Ltd (hereafter referred to as 'the Applicant' or 'Pelagic Energy'), for planning permission in respect of the above development (hereafter referred to as the 'Proposed Development'). The planning application has been submitted electronically via the Planning Portal (ref: PP-12243228) and comprises:

i. This cover letter;
ii. Planning Application Forms and Certificates;
iii. Arboricultural Impact Assessment;
iv. Ecological Assessment Report;
v. A set of Planning Drawings:
    - Statutory Plan (drawing ref. 2703-01-17);
    - Existing Site Plan (drawing ref. 2703-01-18);
    - Site Location Plan (drawing ref. 2703-01-19);
    - General Arrangement (drawing ref. 2703-01-20);
    - 33kV Cable Typical Trench Cross Section (drawing ref. 2703-01-21); and
vi. The application fee of £532.00 (including the £64.00 admin fee) which has been paid to the Planning Portal using a credit / debit card.

Context to the Proposed Development

Consent was granted on 25th January 2021 for the installation of a battery storage facility ('BSF') and ancillary development on land adjacent to National Grid's Minety Substation (planning ref. 20/07390/FUL). This is subsequently referred to as the 'Minety BSF' or 'the consented development'.

The Minety BSF will be capable of importing (storing) electricity from the grid at times of surplus supply in the system and exporting it back to the grid at times of high demand / reduced generation capacity. This is referred to by National Grid as a 'balancing service'. It will assist in balancing grid frequency at times of system stress. The Minety BSF will provide a flexible back-up power source to the grid and can respond rapidly to variations that result from local and national energy demand, alongside increasing fluctuations in generation resulting from an ever-greater use of intermittent renewable energy sources. Accordingly, it will contribute towards ensuring that there is a reliable and constant supply of electricity across National Grid's transmission network.

The point of connection for the Minety BSF to the electricity grid will be within the adjacent National Grid substation. A new electrical connection cable is required between the Minety BSF and the point of connection within the substation. It was originally anticipated that the grid connection cable would be delivered by a statutory undertaker through their permitted development rights, however this is no longer the case.

The proposed grid connection route would sit outside of the consented development site boundary and therefore requires planning permission.

The Proposed Development

The Proposed Development comprises the laying of three c.320m 33kV electrical cables between the approved Minety BSF site and the adjacent National Grid Substation. The existing site is shown on drawing 2703-01-18, and the site location is shown on drawing 2703-01-19.

The proposed cable route would begin at the western edge of the consented development site and follow the existing National Grid substation access road. The cables would then cross beneath the access road and follow the southern side of the road around the substation complex. The route is identified on the General Arrangement (drawing 2703-01-20).

The grid connection cables would then connect to infrastructure of the substation. This infrastructure is not currently in place but is being sought through planning as part of National Grid's plan to expand the substation (reference PL/2022/09258).

The grid connection cables would be laid within a mechanically excavated trench, c. 1.37m deep by 1.39m wide. The three cables would be laid within a single trench and details of their arrangement and how the trench will be dug are shown on drawing 2703-01-21. The trench would run adjacent to the existing access road for the majority of the route. Vegetation is less established here than in areas further from the access road and therefore ecological impacts from ground clearance would be reduced. The cable cannot be laid beneath the access road (for the entire length) due to National Grid's requirements to keep the road accessible to the substation in case of emergency etc.

Some sensitive locations, such as the crossing of existing services, would require hand excavation. Suitable root barriers would be installed within the trench when in proximity to existing or proposed trees. Once the cables are jointed, all trench / excavation support equipment would be removed, the excavation would be backfilled and the area reinstated to existing ground levels and conditions.

Planning and Environmental Issues

The site is wholly located within Flood Zone 1 and is therefore not at risk of flooding. In addition, the site is not located within or adjacent to any protective environmental designations. There are no heritage assets within close proximity to the site. The closest residential property is situated 600m south of the Proposed Development. Other environmental matters are discussed below.

Public Right of Way

The proposed grid connection crosses a public right of way (PROW) along the north of the existing substation access road. A temporary PROW diversion would be applied for while construction works are being undertaken along this section of the route. This would simply divert the route a few meters to the side of the existing path, thus enabling the continued use of the footpath whilst the construction works for the cable route were taking place. The trench would be backfilled following the works and the surface would be reinstated. Accordingly, the impacts on users of this PROW would be temporary and would not prevent the use of the footpath.

Trees

Longleaf Tree and Woodland Consultancy Ltd were commissioned to undertake an Arboricultural Impact Assessment (AIA) and a tree survey was carried out along the route in June 2023. The AIA has been submitted in support of this application and includes an Arboricultural Method Statement and Tree Protection Plan.

The AIA identifies that several tree groupings along the route of the Proposed Development will require removal. These are primarily Category C (poor quality) with some Category B (moderate quality). The Arboricultural Method Statement sets out the specification for tree protection measures and how sensitive operations are to be carried out for works in close proximity to retained trees. The Tree Protection Plan details the location of the tree protection measures which would be put in place during construction works, including tree protection fencing.

Ecology

An Ecological Assessment Report (EAR) has been prepared in support of the Proposed Development. An extended habitat survey was undertaken along the proposed cable route on 11th May 2023. The EAR notes that the future ecological baseline of the area to the south of the substation is likely to differ from that recorded during the habitat survey due to the proposed expansion by National Grid. As mentioned above, this includes an area at the western extent of the cable route where new substation infrastructure is proposed and a significant amount of vegetation and trees would be cleared as part of this.

The Site is primarily comprised of scrub and woodland edge habitats. An ancient woodland is present to the south of the cable route, however the EAR considers that, due to current land use and the small scale and temporary nature of the works, no deterioration of ancient woodland is predicted to occur. The Site is not located within or immediately adject to any statutory or non-statutory designated sites for nature conservation.

Whist some vegetation clearance is required to facilitate the cable laying, existing wildlife corridors and habitat connectivity would be maintained. Following completion of the works, woodland edge habitats would be allowed to naturally re-establish along the route. Biodiversity enhancements would also be provided through the installation of 10 bird and 10 bat boxes on suitable trees in the woodland surrounding the cable route.

Trenches left open overnight would either be covered up or suitable ramps added to provide means of escape for trapped animals. A set of reasonable avoidance measures would be adopted during construction to reduce ecological impacts on locally identified important species.

Planning Policy

The Interactive Map on the Wiltshire Council website identifies that the site is only allocated within the affordable housing zones for Hankerton Civil Parish (CP) and Charlton CP. The Proposed Development is necessary for the operation of the consented Minety BSF and without this infrastructure, the net zero benefits of the BSF would not be possible to deliver. Furthermore, the grid connection cable would be underground for the route and once installed, the land would be fully reinstated to its previous condition.

Summary and Conclusions

This planning application has been submitted to Wiltshire Council by the Applicant for the development of a grid connection cable route. The Proposed Development is essential infrastructure for the Minety BSF, which would help ensure national energy security and address the strategic need for grid balancing services.

The proposed infrastructure would primarily be laid within a mechanically excavated trench. Once installed, the land would be fully reinstated to its previous condition. Some edge of woodland vegetation and trees would be removed, however the ecological impacts would not be significant and vegetation would be allowed to naturally re-grow. Biodiversity compensation / enhancement measures would be provided through the installation of bird and bat boxes on suitable trees within the adjacent woodland areas.

Additionally, the Proposed Development would not have any negative impact on flood risk, heritage assets or landscape and visual impacts.

Based on the foregoing, it is recommended that the award of planning permission for the Proposed Development is fully justified, and thus should be granted.

We trust that the content of this letter and the application documentation are self-explanatory. However, please do not hesitate to contact the undersigned should you have any queries or require any further information.

Yours faithfully,

Ben Hackeson

Ben Hackeson

Planning Consultant on behalf of Axis