

SPA_0101_001

14th May 2021

Planning Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
ST13 6HQ

Via Online Submission

Town & Country Planning Act 1990

Town & Country Planning (Environmental Impact Assessment) Regulations 2017

Dear Sir or Madam,

Proposed Development of a Battery Storage Facility

at Land East of Cellarhead Substation, Rownall Road, Cheddleton

Request for Pre-Application Planning Advice and Adoption of an Environmental Impact Assessment Screening Opinion

I am pleased to enclose a request for pre-application advice in respect of the above described development. The proposed scheme comprises the installation of a battery storage facility with an electrical capacity of approximately 300MW. In addition to this Supporting Statement, the following documents have been provided in support of the submission:

- Online Submission Forms
- Drawing 00 CELLARHEAD-D-102-B – Site Location Plan
- Drawing 00 CELLARHEAD-D-103-B – Proposed Site Layout Plan

The pre-application fee of **£1,130.00** (covering one meeting and subsequent written advice) will be provided separately by the applicant. I would be very grateful if you could provide the necessary details for online or telephone payment as required.

This statement provides an outline of proposed development incorporating a brief description of the application site followed by background and justification for the proposals, along with a formal request for the Local Planning Authority to adopt an EIA Screening Opinion.

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In respect of the pre-application advice sought, in addition to an understanding of the LPA's general view of the proposals and requirements for supporting surveys and reports, we are particularly keen to reach agreement on the scope for exercise to demonstrate the required Very Special Circumstances, given the Green Belt location. Further details on this are set out below.

The Application Site

The application site relates to an area of approximately 2.65 hectares located 190 metres to the east of the existing National Grid Cellarhead Substation. The site currently comprises actively farmed arable agricultural land within the Stoke. The site is within the Stoke-on-Trent Green Belt and in the open countryside for the purposes of planning policy. The site is well enclosed and screened by existing boundary trees, with opportunity for infill planting to provide even more comprehensive screening. The site benefits from an existing access point from a private road located at its south-western corner, leading to the adopted Rownall Road approximately 280 metres to the east.

The Proposed Development

The proposals would comprise a series of 140 no. battery containers, with approximate dimensions of 3.5 metres in height, 12.19 metres in length and 2.44 metres in width. Each container is accompanied by an inverter and a transformer unit. In addition to the battery storage units, 6 no. switch rooms are located throughout the site. All of the equipment is contained within a secure acoustic fence enclosure, which will minimise the external impact of the generally low level of noise associated with the inverters.

The National Grid has identified an urgent need for battery storage infrastructure to be provided in order to provide sufficient reserve electricity in the nationwide system. Battery technology stores excess power from the grid at times when supply exceeds demand, and returns it at times when demand would otherwise exceed baseload supply, thereby avoiding rolling blackouts. Due to constraints on the grid which prevent connections for reserve facilities in many locations, it is essential for such developments to be delivered wherever there is a viable grid connection. In the case of these proposals, it has been confirmed that there is an available connection to the nearby Cellarhead Substation.

The proposed battery storage facility will also make a major contribution to the national effort to achieve decarbonisation, including the target of reducing emissions by 68% (compared to 1990 levels) by 2030 and the target set down in law to achieve net-zero emissions by 2050. Battery storage infrastructure allows the excess electricity generated by renewable energy generating stations across the UK to be stored when the national supply is in surplus, and

returned to the grid when it is in deficit compared to domestic electricity consumption. This means that with sufficient storage capacity, the contribution of renewable energy sources to the UK's electricity supply could be increased to 100%, whereas it is currently limited by the intermittent nature of wind and solar technologies. Battery storage is therefore an essential component of the plan for decarbonisation, and these proposals would represent a flagship development in the provision of storage infrastructure.

Green Belt Context

Because the site is located within the Green Belt and does not constitute a form of appropriate development in the Green Belt, the National Planning Policy Framework requires Very Special Circumstances to be demonstrated in order to justify the proposals. Whilst any planning application made subsequent to this pre-application request would be supported by a detailed Green Belt Justification Statement, the VSC case for battery facilities can be summarised as follows:

1. The urgent need for battery storage (and other forms of reserve electricity infrastructure – but alternatives such as gas generation are generally not preferable due to noise, air quality impacts and climate change impacts);
2. The essential need for the facility to be located close to its connecting substation – in this case National Grid Cellarhead Substation;
3. The sustainability benefits of the development conferred by NPPF paragraph 147, because it constitutes a renewable energy project (as confirmed by the Chief Planner Planning Update Newsletter of December 2017). In this context the scheme provides very significant benefits due to its capacity of ~300MW whilst resulting in significantly lower impacts compared to an equivalent solar PV (substantially greater land take) or onshore wind technology (substantially greater scale and landscape impact);
4. The co-location benefits in planning terms due to siting the development close to the existing substation infrastructure, whereby they will share a visual envelope reducing the overall landscape and visual impacts of the equipment;
5. The economic and employment benefits of the development, by supporting the security and resilience of existing employment use within the district by ensuring a secure and uninterrupted electricity supply, as well as through direct and indirect job creation; and
6. The temporary and reversible nature of the development, which would have a maximum lifetime of 30 years.

For the purposes of our Green Belt policy appraisal we consider whether the proposed development could be technically and viably accommodated on an alternative non-Green Belt site. Due to the need for reserve infrastructure to be provided wherever feasibly possible, the

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area of search must be centred on the connecting substation – in this case National Grid Cellarhead. Due to the costs of cabling, installation and maintenance and the practicalities of securing the necessary easements, we apply a maximum distance of 800 metres between the development location and the connecting substation, in order to carry out an area of search.

We will also provide a detailed Landscape and Visual Impact Assessment in support of any forthcoming planning application, in order to assess the impact of the proposals on Green Belt openness, so that this degree of impact can be weighed in the planning balance alongside the identified VSCs.

I would be very grateful if you could confirm as part of the pre-application response whether the parameters for the Green Belt appraisal outlined above are agreeable to the Local Planning Authority, or whether any other information would be required.

The Very Special Circumstances case for battery storage development in the Green Belt is becoming widely accepted by Local Planning Authorities. I would draw attention to the following example cases where planning permission has been granted for battery storage development within the Green Belt:

- South Oxfordshire Application Ref: **P19/S0623/FUL**
- Welwyn Hatfield Application Ref: **6/2017/2340/FUL**
- South Ribble Application Ref: **07/2017/2821/FUL**
- Trafford MBC Application Ref: **92459/FUL/17**
- Rochford Application Ref: **17/00939/FUL**
- Central Bedfordshire Application Ref: **CB/18/01795**
- London Borough of Havering Application Ref: **P0887/18**
- Barnsley MBC Application Ref: **2017/0624**
- NE Lincolnshire Application Ref: **DM/1016/17/FUL**
- Wycombe Application Ref: **17/05825/FUL**
- Rotherham MBC Application Ref: **RB/2017/1132**
- Purbeck Application Ref: **6/2019/0608**
- Bradford Application Ref: **18/03894/OUT**

In many of these cases the degree of definitional harm and harm to the openness of the Green Belt has been greater than that which we anticipate in respect of the application site at Cellarhead. Nevertheless, the determining authorities have correctly taken the view that the Very Special Circumstances which exist in support of battery storage development in the Green Belt have clearly outweighed the identified harm in each case. We can provide further details of these cases and others, as required.

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NSIP & Environmental Impact Assessment

While the proposed battery storage facility would make a significant contribution to the national effort to decarbonise the UK's energy supply, the environmental impacts of the technology are remarkably low. In recognition of this, the Government has removed battery storage technology from the NSIP regime via the Infrastructure Planning (Electricity Storage Facilities) Order 2020. The proposals are therefore suitable for a local level planning determination.

In respect of the Environmental Impact Assessment regulations, the proposals do not fall within either Schedule 1 or Schedule 2 of the regulations (they do not involve on-site generation of electricity). The site is not within or partly within a 'sensitive area' as defined in the regulations. We therefore consider that the proposed development does not trigger the requirement for Environmental Impact Assessment, and we would be grateful if the Council could consider this concurrently with the pre-application process and adopt a formal EIA Screening Opinion.

Summary

We believe that these proposals represent an opportunity to secure a flagship development in the national effort to achieve decarbonisation and net-zero emissions by 2050, and a major asset to the sustainability credentials of the district. We consider that the benefits of the proposals which have been outlined above will clearly demonstrate the necessary Very Special Circumstances to justify development in the Green Belt.

I would be very grateful be very grateful if you could confirm by reply suitable dates for a meeting to discuss the detail of the proposals with a view to providing a written pre-application response in due course. In the meantime, if you require any further details or have any queries at all in relation to the proposals, please do not hesitate to contact me at your convenience.

Yours faithfully,

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Director

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