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Staffordshire Moorlands DC
Moorlands House
Stockwell Street
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Our Ref: SRE1151

Date: 22/09/2023

Dear Sir/Madam

Re: ENGINEERING WORKS TO ALLOW FOR THE INSTALLATION OF A CABLE CONNECTION BETWEEN CELLARHEAD SUBSTATION AND THE CONSENTED BATTERY ENERGY STORAGE SCHEME (REF - SMD/2022/0548)

Planning permission was granted by way of a Decision Notice issued on 27th June 2023 for the 'Erection and operation of a Battery Energy Storage System and associated infrastructure and equipment' on 'Land adjacent Cellarhead Substation, Rownall Road, Wetley Rocks, Staffordshire' under application reference SMD/2022/0548.

The Proposal

On behalf of our client, Sirius Renewable Energy Ltd, we are now seeking planning consent to carry out engineering works to allow for the installation of an electricity cable which will connect the approved battery energy storage system (BESS) to the grid supply point (within the National Grid Cellarhead Substation compound). Planning consent is sought for the engineering operations associated with installation of the section of cable which runs outside of 'the consented site'. Installation of the cable is to be carried out using a combination of directional drills and trenching.

The battery energy storage site is hereafter referred to as 'the consented site'.

Whilst planning consent was granted previously for a cable route to the point of connection from the consented site, a new route has been agreed with National Grid. As such, this application, in effect seeks consent for a realigned cable route.

The application has been submitted via the Planning Portal and the appropriate planning fee has been paid via the Planning Portal. The application is accompanied by the following documents:

- This Covering Letter;
- Completed Planning Application Forms;
- Site Location Plan;
- Planning Application Boundary;
- Cable Route Plan;
- Aerial Overview Plan; and
- Arboricultural Survey prepared by FPCR.

The Cable Route

The cable route presented to the Local Planning Authority has been the subject of discussions with National Grid who have offered the route to my client.

The cable route is shown on drawing SRE1151 04 03 and below at Figure 1.1. It will exit the consented site in the north west corner, and run beneath the PROW and existing farm track in a north westerly direction. It will then continue in a north westerly direction along the boundary of an agricultural field, before heading north west beneath the woodland belt. It will then continue beneath the woodland where it will then run under the agricultural field, adjacent to the field boundary which is demarcated by a hedge line. It will then head in a southerly direction broadly following the existing post and rail fence line where it will then enter the northern boundary of the Cellarhead substation. From here works will be carried out by National Grid to connect the cable using their statutory powers. Once the cable is installed and operational it will allow for electricity to be exported to the Grid from the consented site.

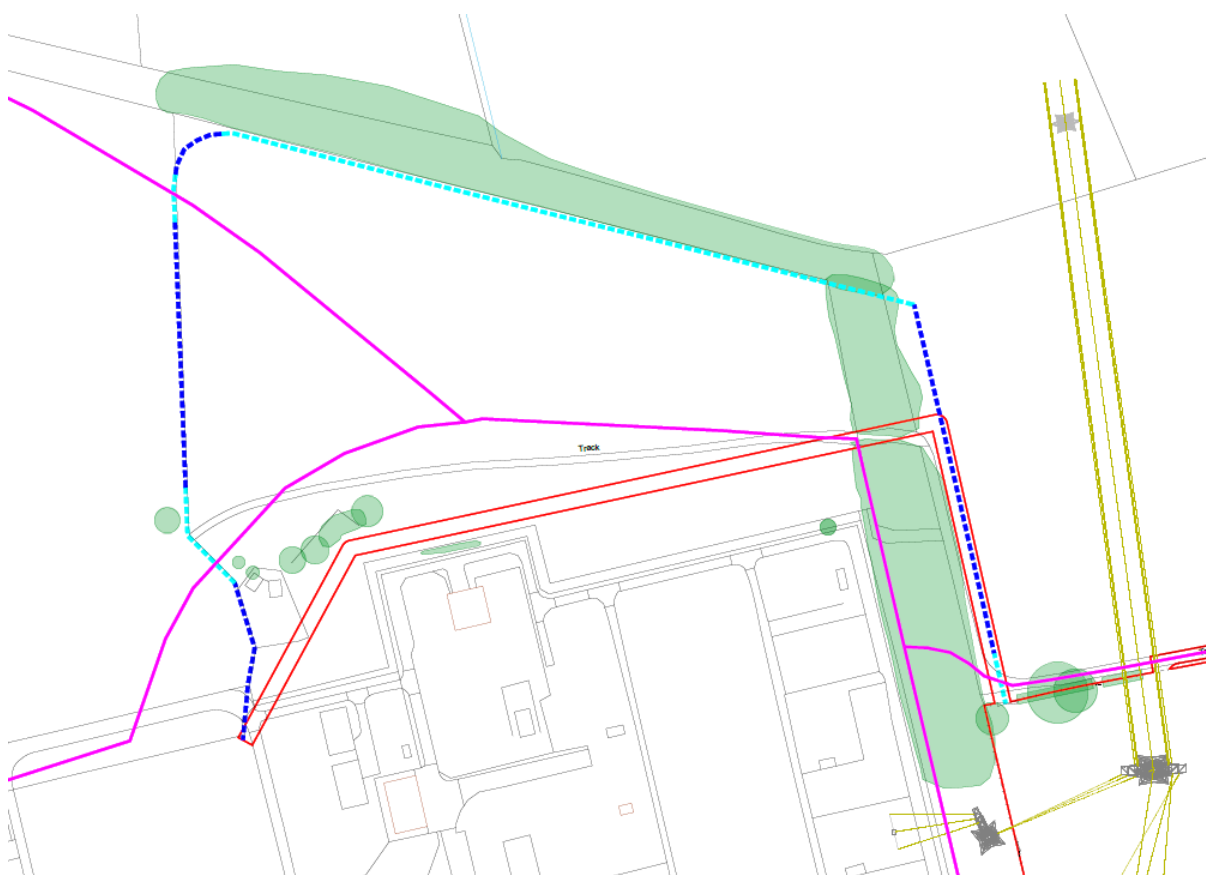


Figure 1.1- Cable Route Plan

The cable route is shown at a width of 6m to allow for flexibility during installation; for example if an obstacle were to be encountered there is sufficient space to traverse this within the 6m corridor. The wider corridor also allows for greater flexibility when operating the machinery needed to install the cable.

Construction Methodology

Whilst there is not anticipated to be any disruption, the works will be undertaken in stages so as to minimise disruption. The construction team will proceed in sections, towards the Cellarhead Substation.

Installation of the cable is likely to be undertaken using a combination of directional drilling and trenches which will be dug using small diggers with buckets. Any trenches dug will be c.1m wide and 2m deep. Trenches will be backfilled as soon as possible to minimise the possibility of flooding.

Whilst there is a possibility the entire route will be installed using directional drills, there are certain

sections which will definitely be installed using directional drills. These sections are denoted by the cyan dashed line in Figure 1.1 and drawing SRE1151 04 03. Directional drills will be used on the sections which run beneath the woodland block, in the area adjacent to the hedge along the northern boundary, and in the sections which run beneath the public rights of way. The use of directional drills in these areas is to avoid any possibility of damage to tree and hedge roots, and to ensure that the public rights of way which run through the site remain unaffected.

To provide the Local Planning Authority with the comfort that there will be no damage to the trees or hedges as a result of the cable installation, an Arboricultural Assessment was commissioned. The survey focussed on any trees within or adjacent to the site that could potentially be affected by the proposal or that may pose a constraint to development.

Whilst no hedge or trees will need to be removed to facilitate the works, it is recommended that the group of low quality trees to the northern edge of the Cerllarhead substation (identified as group G3c) as shown on plan 10541-T-05 in the Arboricultural Assessment prepared by FPCR should be removed. As such the intention is to remove these trees.

As noted earlier, the sections of cable which run near to trees and hedges will be installed using directional drills. The cables will be installed at a minimum depth of 600mm below ground level to avoid any conflicts with trees and hedges. As referred to in the Arboricultural Assessment, it is unlikely that any significant rooting material will be impacted due to the reduction in oxygen at this depth. Roots require oxygen to function and at a level of 600mm the abundance of oxygen within the substrate is reduced.

Any machinery required on site will be positioned outside of the root protection areas identified in the Arboricultural Assessment. No machinery will enter the woodland area. Root protection areas will be clearly demarcated on site through use of appropriate fencing/barriers. This is likely to involve the use of high visibility ribbons tied to metal stakes which are to be pushed into the ground by hand and hammered in.

Whilst soil arisings are anticipated to be minimal as a result of directional drilling, these to be spread across the adjacent agricultural fields, not across any root protection areas. There is no requirement to export soils off site, thereby reducing vehicle movements.

Vehicles and materials are to be stored within the consented site for the duration of construction works (anticipated to be 2 weeks).

Reinstatement and Working Hours

Following completion of works, all surfaces are to be reinstated by the construction team to their original condition. The works are expected to take 2 weeks. Working hours (which are expected to be controlled by planning condition) are to be 0830 to 1800 Monday to Sunday. No work is to take place on a Bank Holiday.

As noted, trenches are to be backfilled as soon as possible following cable installation to minimise the possibility of flooding.

Public Rights of Way

As shown on drawing SRE1151 04 03 and above at Figure 1.1, there are 3no. public rights of way which run over or adjacent to the application site. These will remain remain operational and unaffected by the proposed development. There will be no need to temporarily close or divert the public rights of way.

Sections of cable which are to be installed below or adjacent to the public rights of way will be installed using directional drills i.e beneath the rights of way so as not to cause any disruption to users of the rights of way.

Planning Policy

The proposed development site falls within the administrative boundaries of Staffordshire Moorlands District Council. The adopted Local Development Framework for the application site comprises:

- Staffordshire Moorlands Local Plan (adopted September 2020); and
- Local Plan Policies Map.

Local Plan Policy SD2 relates to renewable and low carbon energy and notes the Council's support for such schemes subject to satisfying technical criteria. The proposal supports a consented energy development and there are no reasons as to why the proposed development should not be permitted.

Local Plan Policy SD4 relates to pollution and water quality. Once installed and operational, the cable will not result in air, water, noise, vibration or light pollution, nor will it contaminate the ground. There are no watercourses in proximity of the site which would be impacted by the proposed development. There are also no residential properties close to the site. If deemed necessary, a detailed Construction Environmental Management Plan can be prepared and submitted as part of an application to discharge conditions prior to commencement of development.

Local Plan Policy SD5 relates to Flood Risk. Environment Agency Flood Risk Maps advise that the site is located within Flood Zone 1 and so has a low risk of flooding. As the application site is less than 1ha, and in Flood Risk Zone 1, a Flood Risk Assessment is not required. All types of development are deemed appropriate in Flood Zone 1 from a flood risk perspective. The proposed development would be operated with minimal risk from flooding and would not increase flood risk elsewhere.

Local Plan Policy DC2 relates to the historic environment. No Historic Landscapes or Scheduled Ancient Monuments (SAM) fall within the application site, and as the cable is to be undergrounded there will be no visual impacts. There are also no Listed Buildings on the site. The potential for surviving sub-surface archaeological remains is considered to be low.

As a result of the above, it is considered that the proposed development is compliant with Local Plan policies SD2, SD4, SD5 and DC2.

Summary

As noted, the application seeks planning consent for the engineering works associated with the installation of an electricity cable which will connect the consented battery energy storage system to the National Grid Substation.

Whilst planning consent was granted previously for a cable route to the point of connection from the consented site, a new route has been agreed with National Grid. As such, this application, in effect seeks consent for a realigned cable route.

Any sections of cable which are to be installed near to trees, hedges and public rights of way will be done so using directional drills, to avoid the possibility of causing any damage to roots, and to ensure that the public rights of way can remain open and do not need to be temporarily closed or diverted. It is expected that the remaining sections of cable will be laid in trenches or directionally drilled.

Any machinery required to install the cable route will not enter the root protection areas. Root protection areas will be clearly demarcated on site to prevent access.

The proposed development will not result in the loss of any agricultural land as all land will be reinstated following the 2 week construction period.

The proposal has been assessed against relevant Local Plan policies SD2, SD4, SD5 and DC2. and is considered to be compliant with them.

Next Steps

Issues pertinent to the determination of the application have been thoroughly considered and we do not foresee any issues which should prevent consent being granted. We therefore respectfully request that planning permission is granted.

If you have any questions or comments I would be happy to discuss the application in greater detail at your convenience.

I can be contacted at dan.elvin@thesiriusgroup.com or on 07590 880 096.

Yours sincerely

A handwritten signature in black ink, appearing to be 'DZ' followed by a horizontal line.

Dan Elvin
Principal Planner

For and on behalf of Sirius Planning Ltd