

Your Ref:

Our Ref: Grendon Lakes

Date: 05/07/2021

Development Management
Wellingborough District Council

F.A.O.

Dear Planning Department,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended 2015): Regulation 6 (1) Request for a Screening Opinion in Relation to a Battery Storage Facility (BSF) land adjacent to Grendon Substation, Grendon Lakes, Wellingborough- Screening Opinion

This letter constitutes a request for a formal Screening Opinion in order to establish whether or not the proposed development, as set out below, constitutes an Environmental Impact Assessment (EIA) development.

In accordance with Paragraph 5(2) of the Town and Country Planning (EIA) Regulations 2011, this Screening Request is accompanied by the following:

- A plan sufficient to identify the land;
- A brief description of the nature and purpose of the development and of its possible effects on the environment; and
- Such other information or representations as the person making the request may wish to provide or make.

The remainder of this letter is spilt into the following sections:

- Section 1: The Development Site
- Section 2: The Development Proposal
- Section 3: EIA Assessment
- Section 4: Conclusions

1. THE DEVELOPMENT SITE

The application Site occupies part of a plot of land which has been previously used as a motocross site, directly adjacent to the Grendon National Grid substation. A series of mounds created to form the course remain and the land is now unmanaged and not in agricultural production. It comprises rough grassland and scrub (mainly blackthorn). Dumping of materials is evident and it is developing an urban fringe character. Landscape quality is also weakened by the numerous high voltage electrical transmission lines in the area, some of which cross the Site.

Flood Risk and Hydrology

EA mapping shows that the proposed development is located within an area designated as Flood Zone 2 (FZ2), classified as at medium risk of flooding from fluvial sources. The proposed access road is shown to be at high risk of flooding, Flood Zone 3.

- The site has not flooded historically.
- The site is at very low to low susceptibility to surface water flooding.
- The site susceptibility to groundwater flooding has been assessed as low.
- The site is not at risk of flooding from reservoir infrastructure failure.
- The proposed development type is defined as 'Essential Infrastructure' in the NPPF and PPG.
- The proposed development is appropriate for the present flood zone (FZ2) and the zone including climate change.

The built development is located within EA Flood Zone 2 and SFRA Flood Zone 2 therefore there is no requirement for either a Sequential or Exceptions Test. There will be an increase in impermeable area and surface runoff will need to be restricted to the greenfield runoff rate of 4.9 l/s. MicroDrainage calculations indicate that the overall attenuation requirement for the development assuming no loss via infiltration is approximately 1,041 m³ for the 1 in 100 year storm event plus a 40% allowance for climate change.

The impacts of the increase in surface water runoff will be reduced by the incorporation of appropriate and practicable SuDS mitigations measures in the built design.

The FRA supporting this Screening Request concludes that the site area is at low risk of flooding from all sources and meets the requirements of the NPPF and Planning Practice Guidance.

Environmental Designation and Ecological Sensitivities

The Site and immediate area are not protected by a designation for the protection of the landscape, but the Site is within 'Countryside' outside the Village Boundary as defined by the Borough Council of Wellingborough Local Plan and Proposals Map. There are no heritage assets on or adjacent to the Site but the Site does lie within the setting of the village of Grendon, part of which is a Conservation Area. There are numerous listed buildings and structures within the Conservation Areas. The effect of the proposed development is assessed in the LVIA submitted along with this Screening Request.

Cherryfield Ecology were instructed to undertake a Preliminary Ecological Assessment, including a protected species risk assessment, at Grendon. The survey area comprised the site and surrounding fields.

The site consists of wet semi-improved neutral grassland with scattered scrub and small ponds and bordered by semi-natural broadleaved woodland. The scrub, grassland and ponds provide high potential for reptiles. The scrub and grassland provide high potential for breeding birds including ground-nesting birds. The scrub and ponds provide moderate potential for GCN, eDNA testing has

been carried out on the three ponds just off site to determine the likelihood of GCN, these results will be submitted as an addendum to the application. The site provides high potential for foraging and commuting bats although negligible potential for roosting bats.

Having regard to the above it is considered that with the inclusion of appropriate mitigation, to be agreed with the Local Authority, there will not be a significant impact to protected species or habitats as a result of development.

Heritage Assets

The proposed development will not be visible from any heritage assets and will have no impact on their setting. Tree planting (and mitigation associated with the consented facility) will also ensure that it will be screened from the village of Grendon, with no adverse effect on the setting of the Conservation Area.

A geophysical survey has not been carried out at this site, this is because the site has been previously quarried and then backfilled, this approach has been agreed with the County Archaeologist.

Agriculture

The Agricultural Land Classification for the site is grade 3, good-moderate, however this land is not currently used for agriculture.

Sensitive Human Receptors

The site is relatively isolated with limited residential properties close by. The village of Grendon is located 1km away to the south-east of the site.

The Site is afforded substantial visual enclosure by the Grendon substation to the west and north and the tree cover within the floodplain to the east. The only significant views are from public footpaths within farmland close to the Site. While many properties on high ground at Great Doddington and Earl Barton afford extensive views across the valley, the Site lies in the distance and is screened by trees. A few properties within Grendon afford views towards the Site, although the majority of the properties within the village do not.

Landscape and Visual

A landscape and visual impact assessment (LVIA) has been submitted along with this screening Request. The Landscape Assessment identifies and assesses the proposals against the key characteristics of the National and County Landscape Character Areas relevant to the Proposed Development.

This assessment concludes that the proposed facility will have no significant adverse landscape and visual impacts and the few minor and adverse impacts identified need to be balanced against the wider benefits of carbon reduction. The proposed development will have a secondary benefit in that it will increase the level of tree screening to the existing substation at a time when the existing screening to the substation is showing signs of decline and effectiveness.

Public Rights of Way

There is a substantial network of public footpaths in the area and several pass through the site. The proposed development will not result in the closure of any Public Rights of Way and they will be kept open during construction.

Traffic and Transport

The site access will be from the Grendon Lakes access track, this track would be upgraded.

During construction/installation of the BSF there would be trips associated with the delivery of materials to site and arrivals and departures of construction staff. Construction material deliveries will mainly consist of small to medium HGVs while staff trips will mainly consist of vans.

During construction/installation of the BSF the proposals would generate a moderate number of traffic movements along the local highway for a short period. It is anticipated the construction period will last approximately six to nine months.

2. THE DEVELOPMENT PROPOSAL

What is it?

The Screening Request is for a 1hour duration 49.99 MW BSF. The battery facility comprises fifteen full size shipping containers modified to accommodate the batteries and fifteen half size containers modified to accommodate the inverters and transformers. The containers can be shipped to site by HGV and placed on concrete blocks set within loose gravel platform.

A single switch and control unit is required which is 13 m long, 5 m wide and 3.9 m high. The whole facility is enclosed within a 2.4 m high mesh security fence and the substation will be enclosed in a palisade fence.

The development includes a 17.5 m wide, 77.5m long substation containing transformers, busbars and other equipment up to 6 m high. This substation will also serve the consented nearby battery storage facility, avoiding the need for a substation to be built in that facility.

The proposed development has been located on the high ground, out of the floodplain and this has been the main driver dictating position and layout. It has, however, been necessary to lower the ground level close to the existing substation, partly to create a level platform but also to achieve the appropriate safety clearance under the existing overhead lines. The artificial mounds within the site and the trees that have colonised them will be removed.

The majority of the facility will comprise a permeable gravel surface and any excess water will be drained to swales and two attenuation ponds.

This layout and the accompanying elevation details set the design parameters for the proposal. An appropriately worded planning condition can be applied to secure the final finished detail prior to commencement.

What does it do?

Battery Storage Facilities provide a means of allowing electricity from the grid to be imported and stored at times of low demand/high generation, which can then be exported back into the grid at times of higher demand / system stress.

System frequency is a continuously changing variable that is determined and controlled by the second-by-second (real time) balance between system demand and total generation. If demand is greater than generation, the frequency falls while if generation is greater than demand, the frequency rises. If the transmission system is not maintained within the required frequency tolerance system stress can result in widespread power supply issues and damage to network infrastructure.

Battery storage is a key part of this energy strategy and provides NG with balancing services to help accommodate the increasing level of renewable energy generation.

By importing excess renewable energy from the grid and storing it, batteries can capture energy that would otherwise be lost / unutilised. In respect of their storage ability, batteries offer opportunities to support the intermittent nature of renewables by storing the excess energy they produce and importing it back into the grid when demand requires.

During situations when primary power sources (e.g. traditional power stations) are interrupted, BSFs can bridge the gap in production, thus avoiding potential blackouts. It should be noted that the UK electricity network is wholly interconnected and issues in one geographic location can have far reaching implications on the network. Accordingly, BSFs offer additional capacity to deal with system stress and any variations in grid frequency at both a local and national level.

As recognised by NG's System Operability Framework (SOF) 5 a: "Faster response is more effective and so less response is needed if speed can be increased." BSF are able to respond more rapidly than other types of balancing services, as they have no start-up delays. As such BSF can balance the real-time requirements of the national grid more efficiently.

3. ENVIRONMENTAL IMPACT ASSESSMENT REQUIREMENTS

The proposed development falls within Schedule 2 of the EIA Regulations; Category 3(a) 'industrial installation for production of electricity'.

The development is not in a sensitive area but does exceed 0.5ha of land. The development should, therefore, be assessed against the criteria in Schedule 3 to judge whether the proposal is likely to have significant effects on the environment. The criteria are as follows:

- The characteristics of the development;
- The location of the development; and
- The characteristics of the potential impact.

Characteristics of the Development

The following considerations are set out within Schedule 3 of the EIA Regulations for determining if an EIA is required:

- The size of the development;
- The cumulation with other development;
- The use of natural resources;
- The production of waste;
- Pollution and nuisances; and
- The risk of accidents, having regard in particular to substances or technologies used.

The facility would make use of scrub land, previously used as a motocross site. It is in a well concealed landscape and will take up 2.02ha of land. The facility will be seen together with pylons, overhead cables and will conceal parts of the substation so there is little if any cumulative impact. There is little or no traffic generated. The facility is remote controlled and secure from public access. The facility produces no waste, nuisance and is safe.

The Location of the Development

The following considerations are contained within Schedule 3 of the EIA Regulations for determining if an EIA is required.

- The existing land use;
- The relative abundance, quality and regenerative capacity of natural resources in the area;
- The absorption capacity of the natural environment, paying particular attention to the following areas:
 - Wetlands;
 - Coastal zones;
 - Mountain and forest areas;
 - Nature reserves and parks;
 - Areas classified or protected under Member States' legislation; areas designated by Member States pursuant to Council Directive 79/409/EEC on the conservation of wild birds and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora;
 - Areas in which the environmental quality standards laid down in community legislation have already been exceeded;
 - Densely populated areas; and
 - Landscapes of historical, cultural or archaeological significance.

The development does not fall within any of the above categories and so we believe can be absorbed into the natural environment. It is considered therefore that the location of the proposed development is appropriate and the development will not require an EIA because of this.

Characteristics of Potential Impact

Schedule 3 of the EIA Regulations provide considerations which should be taken into account when determining the characteristics of the potential impact, as follows:

- The extent of the impact (geographical area and size of the affected population);
- The transfrontier nature of the impact;
- The magnitude and complexity of the impact;
- The probability of the impact; and
- The duration, frequency and reversibility of the impact.

We do not consider that the characteristics of the impact warrant the undertaking of an EIA because the extent of the potential impacts outlined above will be insignificant. Any potential impacts are likely to affect a small geographic area and a small number of the population, principally footpath users.

There will be no transfrontier impacts. Again, the magnitude of the impact is not great as the impacts will be localised and controlled and the complexity of the impact is small.

The duration of a number of impacts other than an acceptable visual impact will be limited to the construction of the development and so will be temporary in nature. Any impacts associated with the operation of the development have been outlined above and are not considered to be significant.

4. CONCLUSION

As noted above, as the development falls within Schedule 2 of the EIA Regulations, the development should be assessed against the criteria in Schedule 3 in order to determine whether an EIA will be required.

The nature of the proposed development is for a BSF on scrub land adjacent to the Grendon National Grid substation. It is therefore not expected to result in any unusual, complex or potentially hazardous environmental effects. Given the low impact of the proposal, it is considered that whilst there will be some effects upon the environment, none of these are considered to constitute 'significant effects' upon the environment, as set out in the relevant guidance. Accordingly, it is considered that the screening proposal is not an EIA development.

We would be grateful therefore if Wellingborough District Council would review this letter and:

- (a) Make a formal determination as to whether or not an Environmental Statement is required in this instance; and
- (b) Formally record this decision on the statutory planning register.

In accordance with Part 2 Section 5(4) of the EIA Regulations, if the Council considers that it has not been provided with sufficient information to adopt a Screening Opinion, please notify the author in writing of the points on which additional information is required.

In accordance with Part 2 Section 5(5) it would be appreciated if the Council could adopt a Screening Opinion within 3 weeks of receipt of this letter or earlier as expedient.

I trust the above is self-explanatory but should you have any further queries please do not hesitate to contact me.

Yours faithfully,

Kirsty Cassie
Project Developer



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