

31 July 2023

Attention: Chief Planning Officer
Sustainable Communities
Mid Suffolk District Council
Endeavor House
8 Russel Road
Ipswich
IP1 2BX

SLR Project No.: 402.08525.00015

RE: PLANNING APPLICATION FOR THE INSTALLATION OF DRAINAGE FEATURES COMPRISING A DETENTION BASIN, UNDERGROUND PIPE, INTERCEPTOR AND GRAVEL STRIP TO SUPPORT THE APPROVED BATTERY DEVELOPMENT ON FARMLAND EAST OF BRAMFORD NATIONAL GRID SUBSTATION SITE, BULLEN LANE, BRAMFORD, IP8 4JL

Introduction

I refer to the above and enclose a full planning application on behalf of my client, Pivoted Power LLP (now re-branded as EDF Renewables) for the installation of drainage detention basin and associated features to support its approved battery energy storage system (BESS) development on Bullen Lane, Bramford. These features would be located immediately east of the approved battery compound and 15m to the north of Bullen Wood.

An earlier application for a drainage swale 5m to the north of Bullen Wood has been withdrawn.

The proposed drainage features would comprise of an underground pipe from the battery compound, a new shallow pond (detention basin) with a hydrobrake device and a shallow gravel strip leading from the detention basin to the ditch.

The application submission comprises the following documentation:

- Completed Application Form and Certificate B
- Application Covering Letter (this letter)
- Planning Statement (contained within this letter)
- Flood Risk Assessment and Surface Water Drainage Strategy (FRA&SWDS)
- Application Fee of £468.00 (to be paid electronically)
- Site Location Plan: BRAM-PP-TCL-DRG-LP007-E
- Site Layout Plan: BRAM-PP-TCL-DRG-P007-E
- Section Details: BRAM-PP-TCL-DRG-P007.2-A
- Preliminary Environmental Appraisal Report (PEAR)

Background

Mid Suffolk District Council granted planning consent (Planning Reference DC/19/03008) to Pivoted Power LLP on 23 September 2019 for a 49.9MW battery storage facility on land adjacent to the Bramford National Grid Substation. Pivoted Power LLP has a connection agreement in place with National Grid for connection of its battery to the transmission grid.

An application for a Non-Material Amendment (DC/21/06919) to DC/19/03008 was approved on 26 January 2022 which amends the description of development from “up to 49.9MW” to “up to 57MW”. The approved development description is:

“Installation and operation of a battery storage facility of up to 57MW, with associated infrastructure including inverters, transformers, switchgear, spares container, fencing, CCTV cameras and access road.”

A subsequent Non-Material Amendment consent (DC/22/05586) for an amended layout was approved on 24 November 2022. The latest Non-Material Amendment consent (23/01841) was approved 26 April 2023 for an amended site layout plan and associated elevations and blocks plans.

An application for the installation of underground power cables between the National Grid substation and the battery compound (DC/22/01861) was approved 01 August 2022.

An application for an amended bellmouth access (DC/22/05587) was approved on 19 January 2023.

An application for a drainage swale (DC23/02280) was submitted May 2023. The application was withdrawn in July 2023 given the objection from the Woodland Trust on the grounds of proximity to Bullen Wood (Ancient Woodland). Based on the consultee responses received the detailed drainage design is now being prepared, as is an updated CEMP. These documents will be submitted to support the detention basin application.

This new application proposes a detention basin 15m from Bullen Wood.

The Applicant

Pivoted Power LLP (now re-branded as EDF Renewables / EDF-R) is an energy business with a key aim of assisting the delivery of the UK Government’s net zero targets. EDF-R develops renewable energy projects including essential supporting infrastructure including battery storage facilities. Bramford is one of fourteen similar projects already consented throughout England which cumulatively will deliver approximately 650MW of energy storage. Batteries at Kemsley (Sittingbourne) and Cowley (Oxford) are now operational.

Need for the Development

SLR Consulting Limited (SLR) has prepared a Flood Risk Assessment and Surface Water Drainage Strategy (FRA&SWDS) to support the consented BESS development.

Storm water discharge from the field currently follows local topographic gradients south and is intercepted by an existing ditch (Southern Boundary Ditch) and conveyed towards the River Gipping.

The flood risk screening assessment has concluded that there are no significant risks of flooding at the battery site. The site is suitable for development when considered against the Exception and Sequential Tests.

The surface water drainage strategy demonstrates that the requirements of national, regional, and local planning policy can be achieved at the site given the nature and the quantum of the proposed development.



The gravel compound and detention basin will provide sufficient filtration while also maximising infiltration where possible (i.e., all features will remain unlined).

The drainage design has been developed to provide attenuation and appropriate discharge of stormwater up to the 1 in 100-year event plus a 20% uplift for climate change.

The proposed drainage strategy provides considerable betterment from the existing regime. Discharge rates from the site will be restricted to the 1 in 2-year greenfield runoff rate of 3.5l/s in line with the requirements of Suffolk County Council.

Need for Planning Consent

The proposed drainage features constitute an engineering operation and change of use of the land, and therefore require planning consent.

The proposed drainage scheme supports the consented BESS development. The BESS development is classified as an “essential infrastructure” development type associated with infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary substations.

Description of Development

The proposed drainage features are comprised of a new shallow detention basin connected to the BESS filter drains by an orifice and small sunken pipe. A hydrobrake device controls flows from the detention basin to the gravel strip that leads to the ditch (discharge point).

As shown in Drawing **BRAM-PP-TCL-DRG-P007-E** the development will comprise of the following:

Red line area of 0.198 ha (1,982m²).

Detention basin measuring 38m (length) x 25m (width) x 0.75m (depth) on the eastern boundary of the battery compound area. Total area of the detention basin would be approximately 827.7m² or 0.08ha

Water would enter the detention basin from a sunken perforated pipe inside the southern boundary of the battery compound. This provides attenuation and filtration before discharge to the receiving ditch.

Runoff from the detention basin would discharge into the Southern Boundary Ditch using a hydrobrake device restricting rates to 3.5l/s. A weir overflow will be required on the detention basin at detailed design to provide a controlled overflow in the event of exceedance of the design storm.

Flows from the hydrobrake will discharge into a small gravel strip which progressively decreases in depth (no pipework required) to reach surface level, allowing for a diffuse discharge into the southern boundary ditch whilst providing additional filtration of flows.



Climate Change

The development will facilitate the operation of the BESS, associated with renewable energy, and generally supported by the NPPF and development plan policies subject to there being no unacceptable impacts of the development. These local policies seek to promote renewable energy and facilitate a reduction in emissions by supporting the transition to more sustainable renewable energy production and adapting to climate change.

Ecology

A Preliminary Ecological Appraisal (PEA) has considered the proposed drainage detention basin. The site comprises the southern edge of the arable field and a modified grassland buffer strip that separates the arable field from Bullen Wood as shown in Figure 2.

Figure 2: View Looking East Towards Proposed Location of Detention Basin

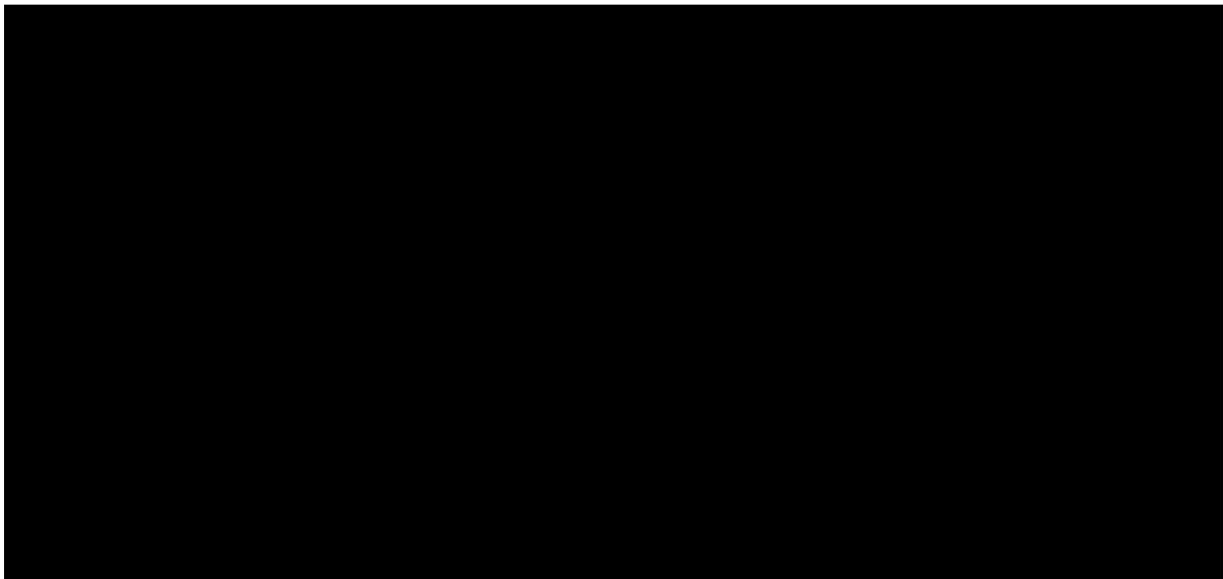


The survey area for the PEA includes the entire 1.5ha agricultural field incorporating the BESS, the access and the drainage detention basin area. Habitats adjacent to the proposed detention basin include arable field (with consent for BESS), native hedgerows, ancient woodland and small areas of modified grassland. The development site is considered to be of low ecological value.

The location of the proposed detention basin would be approximately 15m from the woodland boundary, with an undeveloped, modified grassland buffer in between the detention basin and woodland. There is an existing c. 0.5m deep agricultural ditch already present along the northern boundary of the woodland for the entire length meaning that tree



roots are very unlikely to extend into the arable field in this location. Furthermore, the land within the field itself has been subject to agricultural activities (including ploughing). An adverse impact on Bullen Wood has therefore not been predicted.



Landscape

There will be no visual impact arising from the development of the drainage detention basin. The impact of the excavation areas would be sufficiently mitigated by the existence of surrounding development and equipment.

Highway Safety and Access

For the construction phase, the approved access to the battery storage site has access from Bullen Lane would be used. A site-wide Construction Traffic Management Plan (CTMP) has been prepared which takes this development into consideration. The additional traffic associated with this element is considered negligible.

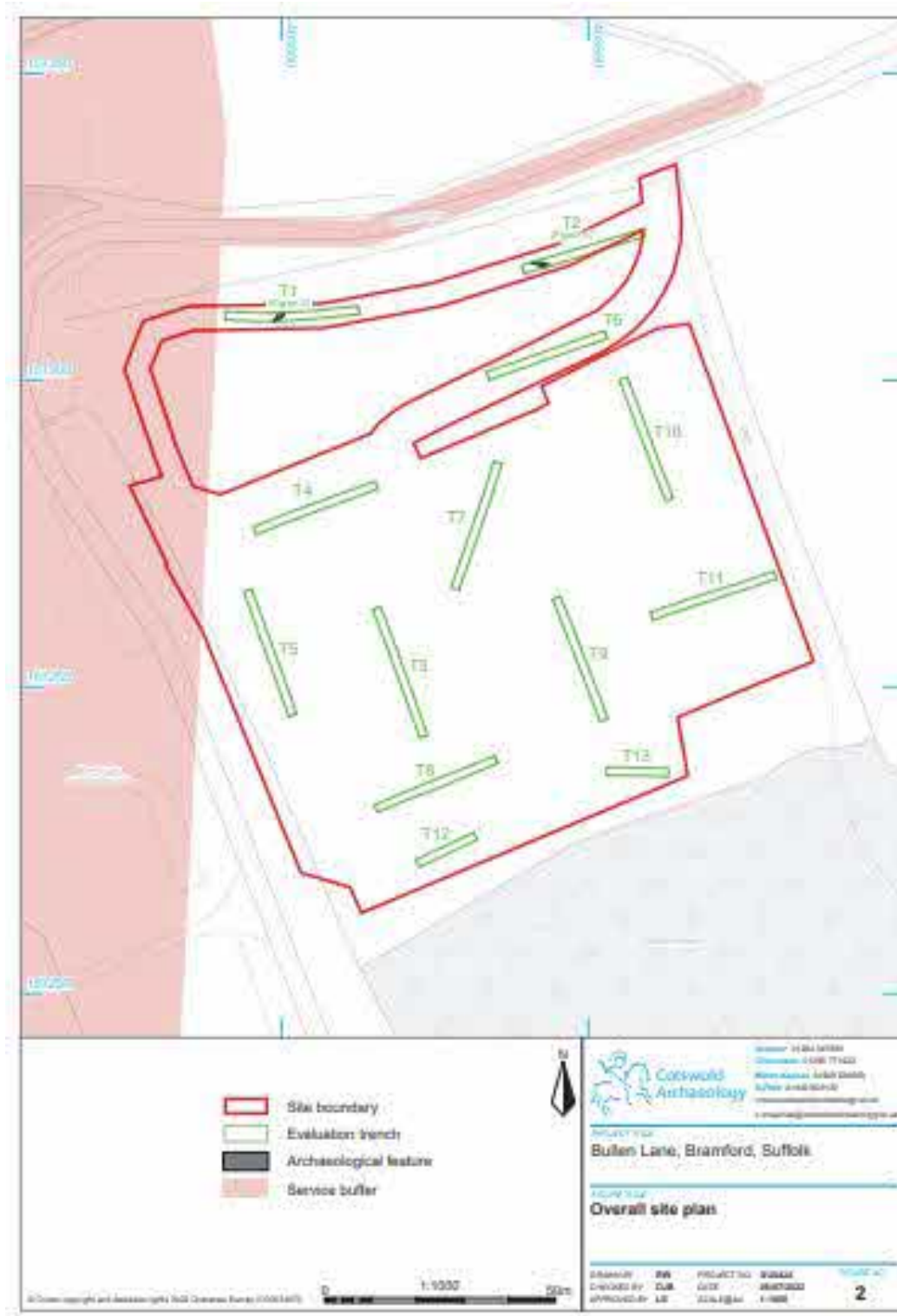
Access to the detention basin will be via gates on the battery compound boundary fence.

Archaeology

The archaeological trial trenching investigation undertaken during Summer 2022 incorporated two evaluation search areas (T12 and T13) within the proposed drainage detention basin area as illustrated in Figure 3. Sussex County Council Archaeology advised there is unlikely to be any significant impact on archaeology and no mitigation is required. The relevant archaeological works conditions associated with the battery storage consent and NMAs were discharged on 22 August 2022. Consequently, there are not considered to be any unacceptable impacts on heritage matters.



Figure 3: Site Archaeological Evaluation Areas



There are no adverse environmental effects which are not outweighed by the significant benefits which will be derived from the proposal.

Conclusion

The proposal will support national and local policies which seek to promote carbon reduction and mitigate the effects of climate change. It will support the delivery of sustainable

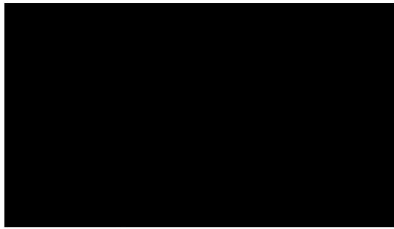


development and renewable modes of energy production by ensuring production and transmission can be maintained and reducing emissions.

If you have any queries or wish to discuss anything further, please do not hesitate to contact me. I look forward to confirmation of validation of this application at your earliest opportunity.

Regards,

SLR Consulting Limited



Jennifer Gordon
MA (Hons) MRTPI
Principal Planner
jennifergordon@slrconsulting.com

Attachments Application submission (made electronically by the Planning Portal)
cc Martin Cole, Planning Director, Pivoted Power LLP
 Mark Collins, Project Construction Manager, EDF-R

