

Our Ref: 2658-02/JM

30th November 2022

Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

planning

transportation
planning

environment

design

Dear Sir / Madam

PROPOSED DEVELOPMENT OF AN ELECTRICAL CONNECTION BETWEEN THE APPROVED LEGACY BATTERY STORAGE FACILITY (PLANNING REFERENCE P/2021/0441) AND NATIONAL GRID'S 275/400KV SUBSTATION, OFF BRONWYLFA ROAD, TALWRN, WREXHAM, LL14 4HY

We hereby apply, on behalf of HD639LEG Limited (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-11730139) and comprises:

- This cover letter;
- Planning Application Forms and Certificates;
- Planning Application Drawings:
 - Location Plan (drawing no: 2658-02-013);
 - Statutory Plan (drawing no: 2658-02-014);
 - General Arrangement and Above Ground Infrastructure (drawing no: 2658-02-015);
 - Existing Site Plan (drawing no: 2658-02-016)
 - 33kV Cable Typical Trench Cross Sections (drawing no: 2658-02-017); and
- The fee of £460.00 which has been paid via Wrexham Council's online payment service using a credit / debit card.

Context to the Proposed Development

Consent was granted on 5th July 2021 for the Legacy Battery Storage Facility (BSF) at the National Grid Substation off Bronwylfa Road (ref: P/2021/0441).

The Legacy BSF would 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 would assist in balancing grid frequency at times of system stress. The Legacy BSF would 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 would contribute towards ensuring that there is a reliable and constant supply of electricity across National Grid's transmission network.

Chester Office:
Well House Barns
Bretton
Chester
CH4 0DH

South Manchester Office:
Camellia House
76 Water Lane
Wilmslow
SK9 5BB

Registered Office

0844 8700 007
www.axisped.co.uk

The point of connection for the Legacy BSF to the electricity grid would be at the adjacent National Grid 275/400kV substation to the south / east. A new connection cable is therefore required between the Legacy BSF and this substation. It was originally anticipated that the grid connection cable would be provided by a statutory undertaker under permitted development rights. However, this is no longer the case and the grid connection to the National Grid point of connection will now be provided by the developer.

Accordingly, planning permission for the underground cable and above ground connection infrastructure within the substation is required.

The Proposed Development

The Proposed Development comprises a 33kV electrical cable between the approved Legacy BSF and National Grid's substation immediately to the east of the BSF site. The existing site is shown on drawing 2658-02-016 and the location is shown on drawing 2658-02-013. The cables would be buried underground for part of the route. At the point of connection with the existing infrastructure of the substation, the cable would be situated above ground. New / upgraded above ground infrastructure is required to support the cable, as shown on drawing 2658-02-015. Existing infrastructure of the substation is included on the drawing for context.

The proposed cable route would run entirely within National Grid's Substation compound. The underground section of the cable would be laid within a mechanically excavated trench. Drawing 2658-03-017 illustrates the two methods for the way that this trench could be prepared along the route. Where the cable route crosses beneath existing internal roads or services within the substation compound, the trench would consist of a pre-cast concrete channel. This is to prevent damage being caused to the cables by vehicles / activities above ground. The concrete channel sections would be circa 1500mm deep and 1700mm wide and a reinforced concrete cover would be placed over the top of the pre-cast channel.

Elsewhere along the cable route, the trenching would be circa 1200mm deep and 1220mm wide. The top of the cable conduits would be circa 825mm underground, protective tiles would be laid 75mm above the cable and warning tape 100mm above the protective tiles. The trench would be backfilled and the existing surface treatment fully reinstated. Some sensitive locations, such as the crossing of existing services, would require hand excavation. 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 protected environmental designations and there are no public rights of way on or adjacent to the site. There are no heritage assets in proximity to the site.

The entire site sits within the National Grid Substation complex where the existing hardstanding and associated infrastructure offers no ecological value.

The majority of the cable route would be underground and would have no visual impact. The above ground infrastructure proposed would not look out of place next to the existing infrastructure of the substation complex. Furthermore, mounding surrounds the north of the substation complex so the development would not be visible from the surrounding area. Overall, there would be no significant visual impact from the Proposed Development.

The Adopted Proposals Map on Wrexham County Borough Council's website identifies that the site is located within Policy EC5 'Special Landscape Areas'. This policy seeks to prioritise conservation and enhancement of the landscape in these areas. It sets out that development within these areas will be strictly controlled, however it excludes 'essential operational development by utility service providers'.

As discussed above, there would be no significant visual impact as a result of the Proposed Development. Notwithstanding this, the cable route is an essential component of the consented BSF and is necessary to connect the scheme to the substation. As mentioned previously, it was originally proposed to be carried out by a statutory undertaker, yet the same outcome would now be delivered by the Applicant. Regardless of who delivered the Proposed Development, it would have a neutral impact on conservation and enhancement of the landscape.

Accordingly, the Proposed Development meets the policy tests of the local development plan and is not constrained by any environmental issues.

Summary and Conclusions

This planning application has been submitted to Wrexham County Borough Council by the Applicant for the development of an electrical connection between the consented Legacy BSF and National Grid's Substation, off Bronwylfa Road. The Proposed Development is an essential component of the Legacy BSF scheme, which would help ensure national energy security and address the strategic need for grid balancing services.

The cable route would primarily be laid within a mechanically excavated trench underneath the existing hardstanding of the substation compound. Once the cable is installed, the site would be fully reinstated to its previous condition. In terms of local development plan policy, the site lies within Special Landscape Area. The existing site is within the National Grid Substation complex which offers no landscape value and thus the Proposed Development would cause a neutral impact and would be viewed in the context of the extensive infrastructure associated with the substation. In addition, the Proposed Development would not have any negative impact on flood risk, ecology and nature conservation interests, 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.

Cont'd./...

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

Yours sincerely

Jonathan Maginness

Jonathan Maginness
Planning Consultant
Axis