

26 July 2024

Zenab Hearn
Principal Planner
Planning Growth and Sustainability Directorate
Buckinghamshire Council

By Email

Dear Zenab,

East Claydon BESS 23/03875/APP
Site Layout Changes and Documents

Please find enclosed a number of documents which relate to changes to proposed site layout, or which are relevant to consultation responses received. I set out the context for the enclosures below.

Site Layout

Due to improvements in battery technology energy density, on review of consultation responses and through design refinement, Statera has made changes to the layout of the proposed East Claydon BESS project (the Proposed Development). The main changes made include:

Removal of the compound containing BESS equipment from Field 3. Field 3 will remain under agricultural production.

Doubling the length of the inverter houses within Field 1 so that the number of inverters for the whole scheme remains unchanged.

Field 4 remains as a landscaped field to provide BNG, screening and permissive open space but the ponds are all now small wildlife ponds and the orchard has been replaced by woodland.

Minor changes to the layout in Field 1 to accommodate the larger inverter houses.

Replacement of the biodiverse inverter house roofs with shallow pitched roofs. The inverter houses will be painted in three different shades of receive greens to create a disruptive colour pattern (note: only one of each of these shades will be used for each inverter house – it is not proposed to mix colour or provide a camouflage pattern).

Creating a more random distribution of trees within hedgerows to create a more naturalistic effect.

Proposed planting has been set back at least 10m from the tributary of Claydon Brook and footbridges across side ditches are upgraded to allow crossing by maintenance vehicles to maintain the watercourse (following comments by the drainage authority). All permanent development, including proposed tree planting, will now not sit within the 9m easement of the drainage board.

As a result of the above, please find enclosed the following documents which are updated to reflect the changes made:

Landscape Specification (Rev A)
Landscape and Visual Addendum
Landscape and Ecological Management Plan (LEMP) (Rev A)

Landscape Specification (Rev A)
Revised Landscape and Visual Amenity ES Chapter (Volume 5) (Rev A)
Appendix 5.B: Accurate Visual Representations (Summer Views)
Appendix 5.B: Accurate Visual Representations (Winter Views)
Appendix 5.A: Landscape and Visual Amenity Figures, Part 1 (Rev A)
Appendix 5.A: Landscape and Visual Amenity Figures, Part 2 (Rev A)
Appendix 5.A: Landscape and Visual Amenity Figures, Part 3 (Rev A)
June 2024 Inverter House Plan (Rev A)
June 2024 Stock Proof Fence Plan
Box Culvert Access Track Ditch Crossing Plan (Rev A)
Ditch A Bridge Crossing Plan
Ditch B Bridge Crossing Plan
Cross Sections 1 (Rev A)
Block Plan (June 2024)
Planting Plan (Sheet 1 of 2) (Rev A)
Planting Plan (Sheet 2 of 2) (Rev A)
Biodiversity Net Gain Assessment (v3)

With a reduced scale to the proposed development, all impacts are lessened somewhat in comparison to those identified as part of the original scheme. Whilst this is the case, lessened effects on archaeology and land use (and to a lesser extent construction traffic) are most notable, as summarised below:

Archaeology: As a result of the changes to the site layout there will be no disturbance of unknown buried archaeology within field 3.

Land Use: The removal of built development from field 3 means that this field can be kept in productive agricultural use.

Traffic: In terms of construction vehicle movements, no changes are proposed to construction or operational vehicle routes as part of the scheme update, these remain as submitted. However, the removal of field 3 from the East Claydon BESS equals the removal of 2.4 hectares of developed land under compound, this is a reduction in electrical infrastructure area of 24.56%. The number of containers is also reduced from the previous 888 to 518. We therefore anticipate a reduction in vehicle numbers during construction in comparison to those previously assessed.

Planning Application Consultation

In addition to the above changes, there have been comments made concerning the planning application which we have also decided to address at this point, these are covered in turn below.

Emergency Services and Fire Safety

Some public comments concern emergency services and how these are considered through the planning process, alongside comments around fire safety. In response a "Fire Safety at Planning Stage & National Fire Chiefs Council (NFCC) Guidance Compliance Note" has been produced and is enclosed with this letter.

Ecology

Comments were made by the Buckinghamshire Council ecologist concerning the application and associated documentation. In response to these, and as agreed with the ecologist, supplementary surveys of overwintering birds and bats have been completed.

The bat survey findings were in-line with the results encountered during 2023 and which also recorded low levels of activity from a low diversity of bat species. As a result, the previous recommendations for mitigation remain valid, such as protection of hedgerow and stream habitats, alongside a sensitive lighting scheme. The results of the additional bat survey accompany this letter.

On additional overwintering bird surveys, 15 notable species were identified which were generally previously recorded in similar abundances during previous breeding bird surveys. The additional survey concludes that no additional survey effort or mitigation measures are necessary. The proposed masterplan also includes the creation of species-rich native hedgerows, woodland, wetlands and scrub, which the survey concludes will have the potential to enhance the foraging value of the site for overwintering notable species, as well as the bird assemblage more broadly. The results of the overwintering bird survey are included alongside this letter.

Biodiversity net gain (BNG) calculations have also been adjusted to take into account the changed project layout and a revised calculation is also enclosed. The results of the Biodiversity Net Gain Assessment concludes that the proposed development will result in the gain of 27.85 (47%) habitat units, 18.43 hedgerow units (40.95%) and 0.77 watercourse units (4.38%), representing a significant gain overall.

In addition to the above surveys, Statera also propose that a Construction Environmental Management Plan (biodiversity) should be a condition attached to any future planning consent and that this should include mitigation measures to avoid impact upon reptiles and black and brown hairstreak butterflies.

On amphibians, the scheme will apply for the project to be completed under the Buckinghamshire Council District licence.

Following conversations with the Buckinghamshire ecologist, the Preliminary Ecological Appraisal is also included alongside this letter.

Environment Agency

We are in separate discussions with the Environment Agency on the matters raised within their comments and hope to be in a position to report back on progress soon.

Buckingham and River Ouzel Internal Drainage Board

Statera has been in discussion with the Buckingham and River Ouzel Internal Drainage Board (IDB) to understand IDB concerns surrounding development within their catchment. In light of these conversations we can confirm that:

No built development is proposed within the 9m byelaw strip required by the IDB for access and operation of maintenance plant and equipment.

No new trees, or native shrub, planting is proposed within the 9m byelaw strip required by the IDB for access and operation of maintenance plant and equipment.

Ditch crossing detail is now included with the application pack, these crossings are to a specification to allow access by IDB operation and maintenance plant and equipment.

I would be grateful if you can accept the enclosed documents as updated replacement or additional documents to planning application 23/03875/APP.

Yours sincerely



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Planning Lead
Statera Energy Ltd