
Battery Energy Storage System Land at Ball Green Farm, Staffordshire Planning Statement

Anesco Ltd

February 2022

**Battery Energy Storage System
Land at Ball Green Farm, Staffordshire
Planning Statement**

Prepared on behalf of Anesco Ltd

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Barton Willmore on behalf of Anesco Ltd (hereafter referred to as the 'Applicant') and provides information in support of the full planning application on Land at Ball Green Farm, east of Bemersley Road, Ball Green, Staffordshire Moorlands (hereafter referred to as the 'Site') for the proposed development (hereafter referred to as the 'Application').

Construction of a temporary 49.35MW battery storage facility, to include a compound, a DNO control room, a customer substation, security fencing, landscaping and other associated infrastructure.

- 1.2 The Statement sets out the details of the Application and should be read in conjunction with the drawings and information accompanying the planning application.
- 1.3 The remainder of this statement comprises the following chapters:
- Section 2.0 provides a description of the application Site, its surroundings and any relevant planning history of the Site;
 - Section 3.0 describes the Proposed Development in more detail;
 - Section 4.0 sets out the need for renewable energy and the sustainability implications of the development;
 - Section 5.0 sets out the Statement of Community Involvement;
 - Section 6.0 sets out the relevant national, regional and local planning policies and guidance relevant to the Site and the Proposed Development;
 - Section 7.0 considers the main planning issues and provides an assessment of how the application complies with planning policy; and
 - Section 8.0 summarises the Planning Statement and draws conclusions.

Anesco Ltd

- 1.4 Anesco Ltd is a national company dedicated to helping businesses, local authorities, housing associations and homeowners to reduce their carbon emissions. Anesco provides comprehensive energy services, from audits through to recommendations, installations and capital funding plans. Anesco's specialist team has managed some of the UK's largest and most complex energy efficiency projects.
- 1.5 Anesco have long understood the potential need for energy storage and is the largest designer, developer, and owner of utility scale BESSs in the UK. Installing the UK's first utility scale unit back in 2014. Anesco have developed and built over 150MW of battery storage projects in the UK with a further 140MW due for construction. Anesco has over six years' experience of asset ownership and management and they currently operate and maintain over 170MW of battery systems.

Environmental Impact Assessment

- 1.6 A Request for a Screening Opinion under Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 was submitted to Staffordshire Moorlands Council by the Applicant on 27 October 2021 (ref. SMD/2021/0691).
- 1.7 A formal screening opinion was subsequently issued by the Council on 19 January 2022. The response is included within Appendix A for reference. In summary, the Screening Opinion concludes that the development is unlikely to have EIA significant effects on the environment and the Council have confirmed that the development is not EIA development.

Application Submission Documents

- 1.8 Table 1.1 below sets out the plans and documents that are submitted with the application.

Table 1.1: List of Application Documents / Plans

Report / Plan	Reference	Consultant
Application Form	PP-11024963	Barton Willmore
Planning Statement	33489/A5/PS/HW	Barton Willmore
Design and Access Statement	33489/A5/DAS/HW	Barton Willmore
Alternative Sites Assessment	33489/A5/ASA/HW	Barton Willmore
Site Layout	C0002462_02_PL Rev C	Anesco Limited
Location and Block Plan	C0002462_03 Rev C	Anesco Limited
ESS Container and LV Substation Plans and Elevations	C0002462_04 Rev A	Anesco Limited
132kv Substation Plan and Sections and Fence Detail	C0002462_06 Rev A	Anesco Limited
Customer Substation Plans and Elevations	C0002462_08 Rev A	Anesco Limited
Single Line Diagram	C0002462_07 Rev A	Anesco Limited
Typical Fence Detail	C0002462_09 Rev A	Anesco Limited
Landscape Strategy Plan	33489	Barton Willmore
Landscape and Visual Impact Assessment	33489	Barton Willmore
Agricultural Land Survey	1937/1	Land Research Associates
Ecological Impact Assessment (including BNG Calculations)	424.05075.00140	SLR
Biodiversity Net Gain Calculations	N/A	SLR
Flood Risk Assessment and Surface Water Drainage Strategy	410.05075.00157	SLR
Geotechnical and Preliminary Coal Mining Risk Assessment	13637	South West Geotechnical Ltd
Transport Statement	N/A	Motion
Noise Impact Assessment	MCA2212	BWB
Heritage Desk Based Assessment	05075	SLR

2.0 THE SITE AND PLANNING HISTORY

Site Location

- 2.1 The Site is located to the east of Bemersley Road. It is situated to the west of the settlement of Brown Edge and to the north of the village of Ball Green, located approximately 250m south of the Site. The Site is surrounded by agricultural fields with a footpath that forms the Staffordshire Moorlands Walks located 200m east of the Site, shown in yellow in Figure 2.1 below.

Figure 2.1: Site Context



Site Description

- 2.2 The Site measures 1.85 hectares (ha) in area and comprises an agricultural field.
- 2.3 The site is not located in an Area of Outstanding Natural Beauty (AONB), National Park, Site of Special Scientific Interest (SSSI) or another ecological designation. The Site is however located within the Stoke Green Belt.
- 2.4 There are no designated heritage assets within proximity of the site, however the Chatterley Whitfield Heritage Park and Heritage Centre is located circa 875m to the west of the site, which contains a Grade I Listed Building, 10 Grade II Listed Buildings and the Chatterley Whitfield Colliery Scheduled Monument. The Heritage Park is also defined as a Local Nature Reserve (Whitfield Valley).

- 2.5 The site is not located within any flood risk areas and is in Flood Risk Zone 1.
- 2.6 There are no Public Rights of Way (PROW) located on the Site. The closest footpath is located 200m east of the Site (ref. Brown Edge CP 13).

Planning History

- 2.7 According to Staffordshire Moorlands Council's website, only one previous application has been submitted on the site previously, which was for the previously mentioned Screening Opinion (ref. SMD/2021/0691).

3.0 THE PROPOSED DEVELOPMENT

Proposed Battery Energy Storage System

- 3.1 The Applicant is proposing to develop a Battery Energy Storage System ('BESS') capable of importing and exporting approximately 49.35 Megawatts (MW) of electricity.
- 3.2 The key elements of the proposal are as follows:
- 14 RISEN energy storage container units containing the batteries, associated control equipment, PCS inverters, cooling system and fire safety equipment;
 - A 132kV substation compound, with a maximum height of 5.5m, with a District Network operator (DNO) substation (up to a height of 3.75m), customer substation (up to a height of 2.9m) and a communications hub;
 - A dedicated access track and security fencing. The batteries will be enclosed with deer fencing which comprises of timber posts and wire mesh, whilst the 132kV substation will be enclosed with palisade fencing which is required for safety and security purposes;
 - 14 Low Voltage (LV) substations each with an open air transformer will be installed with the blocks of battery cabinets. The LV cabins are typically 2m high, 3.7m long and 2m wide which will be painted green. The transformers are generally 2.5m high, 1.5m long and 2.5m wide.
 - High Voltage (HV) switchgear is required to accumulate all the HV cables from the transformers before connecting to the grid network.
 - Before connection to the grid, the Distribution Network Provider (DNO) requires an Intake Substation with various protection settings to protect the grid from any faults that the BESS may cause. This intake substation will be built in compliance with building materials approved by the local planning authority.
 - A Security system is required to prevent both unauthorised access into the battery storage system, and to protect the equipment. This will consist of a 2m high palisade fence which is a requirement by the DNO to ensure the adequate security of the storage system. The palisade is the usual specified fence system to install from the DNO's. A 2m high deer fence will be erected around the perimeter of the Site as an enclosure. A security beam system will also be installed around the fence perimeter. The security beams will be approximately 1.2m off the ground and will employ laser technology so no artificial lighting will be required.
- 3.3 The above should be read in conjunction with the submitted Design & Access Statement and associated application drawings.

Installation Period

- 3.4 The construction of the Site will take approximately 36 weeks with 4-5 commercial vehicles on average anticipated to visit the site daily. The battery banks, substations and other construction materials will be delivered to Site using 16.5-metre-long articulated lorries.
- 3.5 Once constructed, access to the BESS will typically generate one van accessing the application Site twice a month i.e. two two-way vehicle movements per month. The Site will be accessed during the operational phase by engineers for maintenance works including maintaining hedgerows and mowing the grass. There will be no onsite office or permanent staff on the Site, and those attending will do so utilising small vehicles such as transit vans
- 3.6 The proposed development will have a relatively low impact on the existing ground conditions and will not have significant foundation or infrastructure requirements. It is intended that the BESS will have a lifespan of 40 years. At the end of its operational life, the infrastructure will be removed from the Site, and the field will be returned to its previous condition.

4.0 NEED AND SUSTAINABILITY

- 4.1 In the 21st century climate change is a recognised phenomenon of international and global significance. The scientific evidence is overwhelming and identifies that climate change, as a result of rising greenhouse gas emissions, threatens the stability of the world's climate. The continuing production of greenhouse gases and carbon dioxide in particular, is considered to be contributing to the increasing rate of climate change.
- 4.2 In the UK the main strategy for tackling climate change is to significantly reduce greenhouse gas emissions by creating a low carbon economy. As more than two thirds of the world's carbon dioxide emissions come from the way we produce and use energy, energy policy must play a major part in meeting the climate change challenge.
- 4.3 Although the Government is implementing measures to save energy at the same time energy demand worldwide continues to increase. Therefore, a key element of the Government's energy strategy is to provide support for low carbon technologies and in particular incentivise the development of renewable technologies used to generate electricity. Considering the risk posed by climate change and depleting fossil fuel reserves the Proposed Development represents an important part of the UK's strategy to reduce carbon dioxide emissions and improve security of energy supply. Whilst not generating renewable energy in its own right, the proposed development plays an important role in supporting the efficient operation of renewable energy sources and ensuring that there is minimal wastage of energy generated.
- 4.4 An appeal decision in Bolsover District (APP/R1010/W/17/3172633) published in August 2017 acknowledged that Peaking Power Generation Plants can be classed as renewable / low carbon energy development, despite their reliance on non-renewable energy resources (natural gas) for their operation. This is summarised in the following excerpt:

"... as the appeal proposal is required to provide greater capacity and flexibility in the energy generation network the proposed generators could be described as 'associated infrastructure' that would support the move towards low carbon energy supplied increasingly by renewable energy developments. It seems to me therefore that on balance it is not unreasonable to conclude that the proposed development would constitute development required for the exploitation of sources of renewable energy."

- 4.5 On the basis that the proposed development will provide the necessary infrastructure to support renewable energy, as well as the fact that it will not rely on non-renewable energy for its operation, it should be considered within the definition of "renewable and low carbon energy and associated infrastructure", whose delivery is supported by paragraph 152 of the NPPF.

- 4.6 The nature of sustainable energy generation sources are such that they are subject to variances in output due to the intermittent nature of the energy generation, especially from wind and solar energy sources. With coal power stations coming offline, there is a greater requirement to have flexible and clean assets on the network to manage the intermittency from renewable technologies. Energy storage is therefore an enabler for our low carbon future. Given that its purpose will be to provide flexibility on an ever increasing renewable and intermittent grid network without emitting any harmful gases means it's a direct contributor to achieving the UK's carbon reduction target reducing our reliance on fossil fuel generators.
- 4.7 The Government run Department for Business, Energy & Industrial Strategy (BEIS), recently published a document entitles 'Proposals regarding the planning system for electricity storage', and the Executive Summary states *"electricity storage is a key technology in the transition to a smarter and more flexible energy system and will play an important role in helping to reduce emissions to net-zero by 2050. Technologies such as storage, demand side response and interconnection can provide flexibility to the system, by shifting when and where electricity is generated and shifting when electricity is used. Flexibility is essential in order to integrate high volumes of low carbon power, heat and transport into our system"*.
- 4.8 Annex A of the above referenced document states *"the government considers electricity storage facilities to be a form electricity generating station for planning purposes"*.

International Policy Framework

- 4.9 It is widely accepted that greenhouse gas emissions need to be significantly reduced and in 2005 the Kyoto Protocol came into effect providing the first ever framework for international action. Under the Protocol, the United Kingdom, together with 37 other industrialised countries (called "Annex I countries"), committed themselves to reducing greenhouse gas emissions by 5.2% from 1990 levels by the year 2012.
- 4.10 The UK, along with other EU countries has signed up to the EU renewables directive. The purpose of the directive is to set targets for the proportion of energy each member state must generate from renewable energy sources including wind, solar, tidal and biomass. The directive states that 15 percent of total UK energy consumption should be generated from renewables by 2020, with this target rising to 80 percent by 2050.

National Policy Framework

- 4.11 The United Kingdom's Climate Change Programme was launched in November 2000 by the British Government to tackle climate change and cut greenhouse gas emissions. To implement this strategy a raft of legislation and guidance has emerged since that time which has

reinforced the national commitment towards addressing both the causes and consequences of climate change.

- 4.12 The key initiatives and policy documentation is outlined below in date order:

Stern Review 2006

- 4.13 The Stern Review acknowledges that reducing the risk of climate change requires collective and urgent action. The Review scrutinises the problems of climate change from a global rather than a national perspective and provides specific guidance on how a collective international response is required to tackle climate change. The Review recognises that the challenges for the UK include accelerating the deployment of a portfolio of low-carbon technologies which are internationally available.

Energy White Paper 2007

- 4.14 The Energy White Paper sets out policy to deliver a secure, low carbon energy mix for the UK and announces specific measures that will ensure individuals; businesses and Government save energy and reduce their carbon emissions. The overarching goal is to reduce carbon dioxide emissions by some 60% by 2050, with real progress by 2020. This surpasses the initial threshold targets which were set in 1997 when the UK government committed itself beyond the Kyoto Protocol target by setting a national goal to reduce carbon dioxide emissions by 20% below 1990 levels by 2010. The Energy White Paper sets out a framework for action to address the challenges facing the country in relation to climate change, cutting greenhouse gas emissions and the need to ensure secure energy supplies.
- 4.15 The 2007 White Paper reiterates previous commitments made in the 2003 Energy White Paper and Planning Policy Statement 22 on Renewable Energy and the importance of renewable energy generation and the supporting infrastructure. It is stated that renewable energy as a source of low carbon electricity is central to reducing emissions and maintaining the reliability of energy supplies when indigenous reserves of fossil fuels are declining more rapidly than expected.

Climate Change Act (2008)

- 4.16 The Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change. It requires that emission of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.
- 4.17 The Climate Change Act commits the UK government to a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and

abroad. Also, a reduction in emissions of at least 34% by 2020. Both targets are against a 1990 baseline.

Energy Act (2013)

- 4.18 The Energy Act was granted assent on 18th December 2016. Through the Energy Act, the Government aims to further its objectives to meet the UK's decarbonisation and renewable targets. The Bill will establish a legislative framework for delivering secure, affordable and low carbon energy.
- 4.19 One of the key elements of the Bill is the introduction of new long-term contracts to provide stable financial incentives to invest in all forms of low carbon energy generation.

Smart Power: A National Infrastructure Commission Report (March 2016)

- 4.20 The 'Smart Power' document was published by the National Infrastructure Commission (NIC) and set out to review the County's existing infrastructure and set out findings to which the energy sector should aim to evaluate and act upon in order to help meet the UK's carbon 2050 carbon targets.
- 4.21 The use of energy storage is one specifically identified as a practical way of storing energy for use when it is most needed. Electricity has been long known to be difficult to store, but through the evolution of technology there are increasing ways to storage energy so that it can be used when it is most needed. It is noted that the benefits of storage could be substantial, and assist in the reduction of peak demand, by covering for short term management of sudden spikes in demand or unexpected loss of capacity.
- 4.22 There is enormous potential to make storage an integral part of the energy network, and the report encourages network owners to see storage as a central tool to improve the capacity and resilience of their networks and part of a more actively managed system.
- 4.23 The Report further goes on to suggest the UK should take steps to become a world leader in energy storage system, through better regulation, which would allow for a more level playing field to unlock its potential. It sets an indicative aspirational target of 15,000MW of storage which could be economically developed by 2030.

'Upgrading Our Energy System – Smart Systems and Flexibility Plan' – Ofgem (July 2017)

- 4.24 This document was published in July 2017 by the Office of Gas and Electricity Markets (Ofgem), setting out a plan for the government and Ofgem to take action, alongside industry, to deliver a smarter and more flexible energy system by:

- Removing barriers to smart technologies, including storage;
- Enabling smart homes and businesses; and
- Making markets work for flexibility.

4.25 The document outlines that by harnessing the potential of technological advantages such as energy storage, there is an opportunity to upgrade to one of the most efficient, productive energy systems in the world. New developments for energy storage are now being deployed, with over 550MW of battery capacity contracted in 2016 to come online by 2020. Despite facing a number of regulatory and policy barriers, Ofgem states that they want to see storage become a genuinely viable proposition in the energy system. Among the actions Ofgem will take to address regulatory barriers to storage developments are:

- An amendment to the Electricity Act 1989 to include a definition of storage, based on the Electricity Storage Network definition proposed in the Call for Evidence, as a distinct subset of the generation asset class.
- A review of the planning regime to look at whether it could be simplified for storage facilities; and
- Licence changes to make storage facilities exempt from so-called final consumption levies, on the basis that storage facilities are not end consumers of energy.

4.26 The suggestions outlined by Ofgem are considered to be positive and outline the key benefits that storage can deliver to supplement the productivity of the country's renewable energy network

4.27 It is clear from the guidance and research identified above that the potential for battery storage to have a positive impact on the UK's aim of a low carbon economy is significant, and steps should be taken to maximise the potential of this method of energy storage, including its consideration in the planning balance of achieving sustainable development.

Renewable Energy Directive (2018)

4.28 The Renewable Energy Directive (2018) includes a binding EU overall target for 2030 of at least a 32% of energy from renewable resources.

Energy White Paper (December 2020)

4.29 Nationally, the Government announced plans to transition to net zero by 2050 through the Energy White Paper (December 2020). The document acknowledges the need to act and achieve the target through "investment and innovation by the public and private sectors". One

of the goals to achieve net carbon energy within the White Paper is the growth of “clean energy technologies”. Page 9 of the White Paper sets out:

“Decarbonising the energy system over the next thirty years means replacing – as far as it is possible to do so - fossil fuels with clean energy technologies such as renewables, nuclear and hydrogen.”

- 4.30 One clear way to decarbonise the energy system is through clean electricity, which the White Paper outlines *"will become the predominant form of energy, entailing a potential doubling of electricity demand and consequently a fourfold increase in low-carbon electricity generation."* To address this demand, the White Paper acknowledges that *"a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar"* with the need for *"sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios"*.
- 4.31 The White Paper notes that by 2050, energy demand is likely to double as a result of increased uptake in electric vehicles and the electrification of heat, which in turn means there is a requirement for a fourfold increase in the amount of low carbon generation that is currently in the grid, in order to hit the net zero target. Essentially, we need to speed up the rate of delivery of renewable and low carbon energy compared to current delivery rates.
- 4.32 Battery Storage is an advanced green technology offering energy security with the ability to store and release energy into the grid as required, so that the National Grid is more resistant to disruptions at peak times.
- 4.33 In addition, by storing excess renewable energy, BESS developments help contribute towards the binding climate change and emissions targets the UK has committed to under the Climate Change Act 2008. BESS will be critical in helping to fill the gap left behind by the decommissioning of coal-fired power stations.
- 4.34 Unlike large coal or gas power stations, BESS generators have the ability to discharge energy immediately when required by National Grid. This means they are an extremely powerful grid balancing tool that can provide fast frequency response to ever changing demand. Not keeping the grid in balance can lead to power surges or temporary blackouts. ESS has the ability to rapidly discharge to the grid, or to absorb power for redistribution later, thereby helping to keep the grid in balance. This reduces energy waste and improves efficiency. Overall, this type of technology offers great potential for supporting renewable energy and the UK's energy system.
- 4.35 The need for such developments is clearly established and should be given significant weight in the determination of the application. The need is both urgent and apparent.

Staffordshire Moorlands District Council Climate Change Emergency Declaration

- 4.36 Staffordshire Moorlands Council declared a climate emergency on 10 July 2019 with a commitment to become carbon neutral by 2030. Within this climate emergency, they recognised the responsibility that institutions, businesses and communities have in reducing carbon emissions and preparing for any impactful change.

Definition of Battery Energy Storage Systems (BESS)

- 4.37 It is important to reiterate various policy documents to provide clarity as to how BESS should be considered through the planning system. It is acknowledged that the technology does not in itself produce renewable energy, however, the Government's position is clear that BESS should fall within the definition of 'renewable energy generation and associated infrastructure' for the purposes of determining planning applications.
- 4.38 The National Policy Statement (NPS) for Energy EN-1 also provides useful context and states *"it is critical that the UK continues to have secure and reliable supplies of energy as we make the transition to a low carbon economy"*. The NPS recognises that a flexible approach to energy generation is required to provide backup supply for renewable energy sources, as evidenced by the following statement *"the more renewable generating capacity we have the more generation capacity we will require overall, to provide back-up at times when availability of intermittent renewable sources is low"*.
- 4.39 In addition, the Department for Business, Energy & Industrial Strategy (BEIS), the Government department who have the remit of *"building a stronger, greener future by fighting coronavirus, tackling climate change, unleashing innovation and making the UK a great place to work and do business"*, are very clear as to how energy storage proposals should be considered in planning policy terms, which has been reaffirmed in the recently published document 'Proposals regarding the planning system for electricity storage'.
- 4.40 The documents Executive Summary states *"electricity storage is a key technology in the transition to a smarter and more flexible energy system and will play an important role in helping to reduce emissions to net-zero by 2050. Technologies such as storage, demand side response and interconnection can provide flexibility to the system, by shifting when and where electricity is generated and shifting when electricity is used. Flexibility is essential to integrate high volumes of low carbon power, heat and transport into our system"* (our emphasis).
- 4.41 Annex A of the above-mentioned document states *"the government considers electricity storage facilities to be a form of electricity generating station for planning purposes"*.
- 4.42 To add to this, the Energy Institute prepared a Battery Storage Guidance Note for planning (August 2019), which is intended to be for *"local authorities, to help them ask the right questions when making planning decisions"*. The Guidance Note is referenced within the Royal

Town Planning Institutes Research Paper 'Planning for a Smart Energy Future' (July 2019), and therefore carries weight within the professional organisation that oversees Chartered Town Planners.

- 4.43 The Guidance Note states *"in the UK, The Department for Business, Energy and Industrial Strategy (BEIS) has stated that storage projects should be considered as a subset of generation"*.

Locational Requirements for BESS

- 4.44 There are several locational requirements that are necessary to ensure that BESS can be deployed and operated effectively. These are outlined below:
- They must be located within close proximity to a viable point of connection ('POC') to the grid network (e.g. existing sub-station). There are several factors which constitute a viable connection including; ability for existing cables to carry the additional capacity, little or no reinforcement requirements and the extent of the wayleaves required and associated costs. Due to the nature of battery energy storage systems, which import as well as export energy from the grid (solar and wind energy only exports to the grid for example), the extent of such viability criteria become even more critical. This severely restricts the potential locations such a development can be deployed.
 - To be able to develop a BESS, this can only be done where there is a willing landowner who will either sell or lease the land.
 - Such projects must also be in areas where there are no construction hazards. Factors such as topography, flood risk and access can all contribute to this and thus locations are selected very carefully to ensure there are little to no risks during both construction and ongoing maintenance of the project.
 - There is also a preference to locate such projects outside of designations such as AONB's, National Parks and SSSIs.
- 4.45 BESS cannot be located "anywhere", and when seeking to find suitable sites, the grid connection is pivotal and is generally how such projects commence the development stages. As noted above, there needs to be sufficient capacity in the grid network to allow for both imported and exported capacity, and such locations are very limited within the UK and in Staffordshire Moorlands. Indeed, when locations with designations such as AONBs, National Parks and SSSIs are also excluded, the suitable points of connection become even more limited.

- 4.46 Indeed, the initial piece of work that Anesco undertook to pursue this low carbon battery project was to establish whether there was a viable 50MW export/import connection in the area. The applicant liaised with the District Network Operator (DNO) regarding potential locations where there may be a suitable grid connection, and it was confirmed through these discussions that there would be an opportunity to connect to the point of connection to the north west of the Site. This is outlined in the accompanying Alternative Sites Assessment.
- 4.47 There is also a need to find a willing landowner who will allow a BESS to be provided on their land.

Consideration of Alternatives

- 4.48 As noted above and throughout this statement, the factors which drive the location of BESS are complicated and they cannot be located 'anywhere'.
- 4.49 An Alternative Sites Assessment ('ASA') supports the planning application. This has assessed the locational constraints of a BESS and the capacity of substations within the district but also surrounding authorities to establish a POC. The ASA then assesses if there is any alternative suitable and available land within proximity to the POC. From an assessment of alternative sites, the ASA concludes that no suitable alternatives exist.
- 4.50 Given the above, the Application site meets all locational requirements for a BESS development and is the most suitable and preferable Site which is available for the proposed development.

5.0 STATEMENT OF COMMUNITY INVOLVEMENT

- 5.1 This section of the Planning Statement demonstrates how the Applicant has consulted with the local community and key stakeholders regarding the proposed BESS and outlines how the input received has benefitted the preparation of the development proposals.
- 5.2 The Applicant understands the importance of engaging with as many stakeholders as possible throughout the pre-application stage.

Pre-Application Enquiry

- 5.3 As part of the design process, pre-application consultation was undertaken with the Council in the first instance. The main purpose of this consultation was to establish common ground on the principal issues that would need to be addressed in any future planning application, the scope of documents that would need to be included within a submission, and how officers will seek to determine any future planning application.
- 5.4 A pre-application request was submitted to the Council in November 2021, but no formal response had been received at the time of submission.

Public and Community Consultation

- 5.5 Wherever possible, Anesco Ltd seek to engage with the local community prior to the submission of planning applications for their proposed developments.
- 5.6 The Covid-19 pandemic has made public consultation difficult and in terms of hosting a public exhibition, this has not been possible due to restrictions on numbers of people allowed inside venues at any one time.
- 5.7 A consultation leaflet was distributed to nearby residents and businesses, publicising the proposals and seeking views on the proposed application. The consultation radius is shown below in Figure 5.1 below:

Figure 5.1: Consultation Radius



- 5.8 An online meeting was held with members of Brown Edge Parish Council on 15 December 2021 with no significant concerns raised by attendees.

Questionnaire Responses

- 5.9 Residents were encouraged to respond to the leaflet drop by filling in the consultation questionnaire which contained five questions regarding the proposed development. Seven questionnaire responses were received which are summarised below with two general responses also received.

Question 1. Do you support the use of renewable energy to help combat climate change?

- Yes: 5 responses
- No: 1 response
- Unsure: 1 response

- 5.10 The following general comments were also received:

- Fully supportive;
- Renewable energy is the way to combat climate change;
- Renewable energy is supported in the right locations;
- The local environment should be protected;
- The proposal is not renewable energy; and
- Questions what other development will come forward.

Question 2. Please tick the box that most accurately reflects your views

- I / We fully support the Ball Green Farm battery storage development at Bemersley Road: 2 responses

- I / We broadly support Ball Green Farm battery storage development at Bemersley Road: 1 response
- I / We do not support the Ball Green Farm battery storage development at Bemersley Road: 4 responses
- I / We are undecided in the support of the Ball Green Farm battery storage development at Bemersley Road: 0 responses.

5.11 The following general comments were also received:

- Renewable energy is the way forward;
- The Site is located in Ball Green and not Brown Edge and some residents have not received consultation letters;
- Wrong location for the proposal;
- The Site is located in the Green Belt; and
- Wildlife are on and in proximity to the Site.

Question 3. What do you feel are the collective benefits of this development? Please let us know your comments

5.12 The following general comments were received:

- Locally sourced energy for local homes;
- More energy in the grid and therefore, power cuts are unlikely;
- Too close to residential properties; and
- The proposal should be built on brownfield land instead.

Question 4. What do you feel will be the impact of this development? Please let us know your comments:

5.13 The following general comments were received:

- Minimal impact;
- Any impact on the surrounding environment should be minimised and local animal habitats to be enhanced;
- Additional hedgerows should be considered for birds of prey and other animals;
- Close to residential properties;
- Impact on the environment from the decommissioning of batteries;
- Visual impact; and
- Loss of grazing land that supports biodiversity.

Question 5. What challenges do you foresee? Please let us know your comments:

5.14 The following general comments were received:

- Local wildlife to be protected and enhanced; and
- Public objection to the scheme.

5.15 One email response was also received which did not follow the questionnaire format. The response raised concerns regarding the area of distribution of the consultation leaflets use and major concern about the BESS in general.

Section Summary

5.16 The Applicant has undertaken an appropriate level of public consultation which is commensurate to the development proposed; the sites context and surroundings; and the difficulties posed by the global pandemic.

5.17 Local residents have all been made aware of the proposed development and have been offered the opportunity to comment on the proposed development.

6.0 PLANNING POLICY CONTEXT

6.1 This section of the Planning Statement outlines the relevant planning policy context for the proposed development and considers national and local policy guidance. For reference, the following documents are considered the most relevant:

- The National Planning Policy Framework ('NPPF');
- National Planning Practice Guidance ('NPPG'); and
- Staffordshire Moorlands Local Plan (September 2020).

National Planning Policy Framework

6.2 The National Planning Policy Framework (hereafter referred to as the 'Framework') was published on 27 March 2012 and plays a key role in securing radical reductions in greenhouse gas emissions and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. The Framework was revised in July 2021.

6.3 Paragraph 7 identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. Section (C) of Paragraph 8 sets out the environmental objective that the planning system should aim to meet to achieve sustainable development, it states that this includes moving to a low carbon economy.

6.4 Of most relevance is Paragraph 151 which sets out the following in terms of renewable energy proposals in the Green Belt:

151. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

6.5 Chapter 14 seeks to set out how the challenge of climate change can be met. In paragraph 152 the Framework importantly says:

152. It (the planning system) should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

6.6 Paragraph 155 states:

155. To help increase the use and supply of renewable and low carbon energy, plans should:

- a) **provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that**

the adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

- b) consider identifying areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and**
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.**

6.7 Crucially, paragraph 158 sets out that:

158. When determining planning applications for renewable and low carbon development, local planning authorities should:

- a) Not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and**
- b) Approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria use in identifying suitable areas.**

National Planning Practice Guidance

6.8 In March 2014, the Government published its online Planning Practice Guidance ('PPG'). This web-based resource was accompanied by a Written Ministerial Statement which included a list of the previous planning practice documents now cancelled. The PPG contains various guidance of relevance to the registration, processing and consideration of planning applications.

6.9 The PPG offers practical advice in relation to the following areas, of relevance to the Proposed Development:

- Renewable and low carbon energy;
- Climate change; and
- Natural Environment.

6.10 In terms of renewable and low carbon energy, the PPG states that:

"Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable."

Local Planning Policy

Staffordshire Moorlands Local Plan (September 2020)

- 6.11 The Adopted Local Plan for the Council consists of the Staffordshire Moorlands Local Plan to 2033, adopted in September 2020 which is the development plan that sets out the plan for sustainable development in the district.
- 6.12 It is considered that the following policies from the plan are of relevance to the proposed application.
- 6.13 Policy SS10 – Other Rural Areas Strategy is relevant where development is taking place outside of development boundaries but within the open countryside and Green Belt. Part 3 of the Policy states that that development *"enhance and conserve the quality of the countryside by ensuring renewable energy schemes are of an appropriate scale, type and location"*.
- 6.14 Paragraph 6.63 of the supporting text to the policy states:
- "The development of renewable energy sources will also often be in rural areas but such development will almost always have an environmental cost as well as benefits. Such proposals must be weighed against the continuing commitment to protect the environment. The scale and design of such schemes will therefore be of paramount importance and should accord with Policy SD 2".**
- 6.15 The policy wording in conjunction with the supporting should be viewed positively as it appears to be an acknowledgement from the Council that renewable energy proposals require such locations.
- 6.16 Policy SD2 – Renewable/Low-Carbon Energy outlines the Council's aspirations *"to meet part of the District's future energy demand through renewable or low-carbon energy sources"*. The policy outlines that the Council will support small- and large-scale stand alone renewable or low-carbon energy scheme subject to a number of conditions:
- *"the degree to which the scale and nature of a proposal impacts on the landscape, particularly having regard to relevant Landscape Character evidence and impact on the Peak District National Park (taking into account both individual and cumulative effects of similar proposals);*
 - *the degree to which the developer has demonstrated any environmental/economic/social benefits of a scheme, as well as how any environmental or social impacts have been minimised (e.g. visual, noise or smell);*
 - *the impact on designated sites of European (or successor), national and local biodiversity and geological importance in accordance with policy NE 1;*
 - *the impact on the amenity of residents and other interests of acknowledged importance, including the historic environment;*
 - *the degree to which individual proposals reflect current local evidence regarding the feasibility of different types of renewable or low-carbon energy at different locations across the District."*

- 6.17 Policy DC1 – Design Considerations outlines that all development should be well designed and reinforce local distinctiveness. Criterion 2 sets out that development should *"be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance"*. Proposals are also required to protect the amenity of the area, set out by criterion 5, and *"promote the maintenance, enhancement, restoration and re-creation of biodiversity"*.
- 6.18 Policy DC3 – Landscape and Settlement Setting sets out the Council's requirement to protect and, where possible, enhance local landscape. The policy highlights that development which would lead to prominent intrusion into the countryside will be resisted whereas development that respects and enhances local landscape character, conserves or enhances the biodiversity qualities of landscape features and provides opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape will be supported.
- 6.19 Policy NE1 – Biodiversity and Geological Resources sets out that biodiversity resources will be conserved and enhanced by positive management.

7.0 ASSESSMENT OF DEVELOPMENT

7.1 This section identifies the main planning issues and provides an analysis of how the development proposals accord with planning policy at national and local levels. The following matters are considered in turn:

- The Principle of Development, Green Belt and Very Special Circumstances;
- Design Considerations;
- Impact upon Residential Amenity;
- Highways Safety;
- The Natural Environment;
- The Historic Environment;
- Site Specific Infrastructure; and
- Benefits of the Scheme.

The Principle of Development, Green Belt and Very Special Circumstances

7.2 The principle of promoting sustainable development is a golden thread which runs through the Framework and is at the heart of the Government's planning agenda. This requirement to promote sustainable development applies to all developments and a whole range of policies contained in the Framework provide guidance on how to assess the overall sustainability of a proposed development.

7.3 The Framework includes a raft of changes from previous national policy guidance designed to better support the implementation of renewable energy in the UK. Specifically, the Framework states that in order to help increase the use and supply of renewable energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.

7.4 Paragraph 158 of the Framework effectively outlines a presumption in favour of renewable energy developments, as there is now no requirement for applicants to demonstrate the need for such proposals, and as such, applications should only be refused where there would be significant harm as a result.

7.5 Policy SD2 is generally aligned with paragraph 158 of the Framework in that it is positively worded and states proposals for large scale renewable energy proposals will be supported providing they demonstrate environmental, economic and social benefits, do not adversely impact upon matters such as residential amenity, landscape heritage and biodiversity and demonstrate how any impacts will be minimised.

- 7.6 Whilst not capable of generating renewable energy in its own right, the proposed development does aid the efficient and sustainable management and dispersal of renewable energy, to ensure that such developments can function to their optimum level.
- 7.7 As has been set out in this Planning Statement, the Government will support development which will assist in facilitating a move towards a low carbon future, and the delivery of renewable and low carbon energy and associated infrastructure.
- 7.8 Whilst the proposed use as a BESS with capacity for 49.35MW is not a form of renewable energy, it works in tandem with local sources of renewable energy, to ensure that the energy generated by these uses would be harnessed and released for use in the most efficient and sustainable manner.
- 7.9 As has been discussed in depth in the Peaking Power Generation Plan Appeal, infrastructure which provides greater capacity for energy generation is able to be described as associated infrastructure which can support a move towards low carbon economy. Therefore, it is considered that the proposed development, by virtue of providing an energy storage facility allowing for electricity storage during low demand and distribution during high demand, will form an integral part of the electricity network and assist in the reliance on fossil fuels. This also improves the management of the distribution network and eases the need for expensive upgrades and network reinforcement works. Following the Peaking Power Generation Plan Appeal, BEIS have confirmed that for the purposes of planning, the Government considers electricity storage facilities to be a form of electricity generating station.
- 7.10 The Site is located within the Green Belt, within which there is a presumption against inappropriate development. Paragraph 151 of the NPPF acknowledges that elements of renewable energy projects can comprise inappropriate development. As such it is necessary to demonstrate very special circumstances apply to justify the proposed development.
- 7.11 It has already been demonstrated within this statement that a BESS is associated infrastructure which can support renewable energy and a reduction in reliance on fossil fuels, and for the purposes of planning, should be classed as energy generation. It is therefore acceptable for the proposed use as a BESS to form part of the planning balance when considering the very special circumstances, as per paragraph 151 of the Framework.

Very Special Circumstances

- 7.12 It is considered that Very Special Circumstances (VSCs) exist which outweigh the harm that would result from the proposed development. It should be noted that paragraph 147 of the Framework acknowledges that whilst renewable energy projects are deemed as 'inappropriate' in the Green Belt, the "*wider environmental benefits associated with increased production of energy from renewable sources*" could be deemed to represent VSCs.

7.13 As noted above, there is a requirement to demonstrate that 'Very Special Circumstances' exist which outweigh the harm by the inappropriateness of the proposed development. Our VSCs case is outlined below:

- **The urgent need to secure renewable energy** to be deployed at scale as part of the UK's transition to net zero is backed by unequivocal policy support, and the need for a range of technologies to deliver this is critical to maintain the security of the UK's electricity supply. The proposed development is entirely in accordance with national and local policies in terms of providing the infrastructure necessary to facilitate the growth of renewable energy;
- **The declared climate emergencies of the UK government** and Staffordshire Moorlands Council's aspirations for the District to be Carbon Neutral by 2030;
- **Energy Security** – it is clear that the overriding objective of national energy policy is to maintain the security of the UK energy supplies, including electricity. There is an urgent need to transition to a renewable and low carbon electricity network but the supply from such sources is intermittent. As such, the need for a BESS is vitally important as we transition away from traditional coal fired power, to ensure that efficiencies in the grid are maintained and more importantly, to ensure that demand will be met. Put simply, without the delivery of BESS, at scale, we cannot transition to a renewable and low carbon future;
- **Proximity to an existing grid connection with sufficient capacity** – there are very specific locational requirements for BESS and one of the key element is the requirement to be situated within proximity of an existing grid connection, which there is sufficient capacity to import and export the additional power that is being generated. Such locations are very limited around the country and Staffordshire Moorlands is no exception, as demonstrated by the accompanying Alternative Site Assessment, which increases the likelihood of requiring a Green Belt location. This is further heightened by a significant amount of the district designated as Green Belt land. Above all else, the location of BESS must be driven by its operational requirements, not the land use designation. Whilst the policy position with regards to Green Belt is noted, the Framework is clear that renewable energy proposals and associated benefits are a VSC in their own right;
- **Lack of alternative sites within proximity to the existing grid connection** – An ASA supports the planning application and highlights that no alternative sites exist within sufficient proximity to a POC with capacity that are located outside of the Green Belt. As such, a green belt location is the only possible location for a BESS in the district. The ASA demonstrates that our Site is the most preferable, suitable and available Site to deliver the scheme;
- **The delivery of biodiversity net gain** – the ecological appraisal, prepared by SLR outlines that the proposed development will lead to significant biodiversity net gain;

- **Temporary and reversible impacts** – the proposed development represents a temporary use within the Green Belt and the Site would be decommissioned and restored to full agricultural use after 40 years. Over the lifespan of the development, the proposed landscape and ecological enhancements and management would result in long term beneficial effects on landscape character, landscape features and biodiversity;
- **Landscape Impact** – the Site is not covered by any landscape designations and it has a small development parcel and density, meaning visual impacts are minimal and can be largely mitigated. The proposed landscape mitigation measures include native woodland planting to the east of the Site, native tree planting around the Site and along sections of the proposed access road, new and reinforced hedgerow planting to create a buffer between the proposed siting of the infrastructure and the west of the Site and a proposed wildflower meadow surrounding the proposed development;
- **Form of development** – this has a substantial weighting on any alteration to the perception of openness. The development has a smaller scale, height, massing and density than the existing buildings and infrastructure in the surrounding landscape, including farmsteads, residential properties and high voltage overhead powerlines;
- **Impact on the Green Belt** – it is acknowledged that the proposal introduces development into an area where there is currently little, and therefore, technically there is a reduction in openness. However, the harm to the Green Belt as a result of the development is very limited and outweighed by the benefits of the proposed development. The proposed development is confined to the Site and its immediate context and restricted by the limited extent to which the openness of the Site can be perceived. On this basis, it is considered that the strategic function of the remaining Green Belt would remain intact; and
- **The development is in accordance with planning policy** – planning policy at the national and local level provide, in principle, support for the development of energy infrastructure which supports the transition to a low carbon energy system, subject to any adverse impacts on amenity and the environment being appropriately mitigated.

Assessment of the Harm to the Green Belt

7.14 The Framework sets out five purposes for including land within the Green Belt, which are outlined at paragraph 138, which are deemed to be as follows:

- a) To check unrestricted sprawl of large built-up areas;
- b) To prevent neighbouring towns merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 7.15 A key element of Green Belt policy at a local and national level is to ensure that the 'openness' of the Green Belt is retained and kept permanently open. There have been several appeal decisions which have considered 'openness' and it is now acknowledged as being a combination of elements, which include spatial and visual impacts.
- 7.16 The Green Belt is a significant development constraint within Staffordshire Moorlands Council and there is no open land in proximity to a connection point with capacity which is not within the Green Belt. As the wider area is fully designated as Green Belt, with the west of the District designated as Green Belt and the east located outside the Green Belt, there are no pieces of land nearby which are not designated as Green Belt and are practical for the placement of a BESS. This is demonstrated in the accompanying ASA.
- 7.17 The Site has a sloping topography however, the proposal will be located behind the brow of the hill on the Site, with the Site sloping west to east and therefore, will be largely hidden from view from Bemersley Road. The fields to the west and south of the Site are at a higher level and therefore, are more visually prominent and would likely impact the perceived openness of the Green Belt.
- 7.18 The proposed development is also set back from Bemersley Road with fields separating the Site and the road, making it less visually prominent. Any further east than its proposed location, then the development would require further loss of trees and hedgerows with a thick tree belt located to the east of the Site. Further east the Head of Trent becomes a flood risk constraint, and the proposal would encroach on the Staffordshire Moorlands Walks, the length of connection also increases.
- 7.19 It is therefore considered that the proposed location is the preferred option to locate the BESS, allowing for connectivity, and minimising the impact on views and the openness of the Green Belt.
- 7.20 The Landscape Strategy Plan shows the proposed landscaping as part of the proposals including native woodland planting to the east of the Site, native tree planting around the Site and along sections of the proposed access road, new and reinforced hedgerow planting to create a buffer between the proposed siting of the infrastructure and the west of the Site and a proposed wildflower meadow surrounding the proposed development.
- 7.21 The proposed landscaping will create a further visual buffer to the proposals and reduce the visual impact from the introduction of the BESS infrastructure into the countryside and Green Belt. As such, through mitigation measures, the impact on views and openness of the Green Belt will be further minimised.

- 7.22 The Landscape and Visual Impact Assessment ('LVIA') documents review in more detail the proposed developments impact on the Green Belt, with a Green Belt Assessment undertaken as part of the LVIA, but the conclusions are summarised below against the 5 purposes of the Green Belt.

Table 7.1: Conclusions against the 5 Purposes of the Green Belt

Purpose of the Green Belt (NPPF, 2018)	Assessment
To check the unrestricted sprawl of large built-up areas	The Site is not located in close proximity to existing built up urban areas. The Site is small and located on lower lying landform which restricts the contribution the Site makes to the local landscape character. Although there is currently no development within the Site, the Site has clearly defined boundaries that can be further enhanced through the development proposals.
To prevent neighbouring towns from merging into one another	The Site is located outside of both the nearby settlement boundaries of Ball Green and Brown Edge. The physical barriers, distance, topography and surrounding land uses ensure no perception of a merging of settlements.
To assist in safeguarding the countryside from encroachment	As the Site is located within the countryside any development would be considered as encroachment. However, the local landscape contains a number of farmsteads and energy infrastructure that reduce the sense of rural countryside. The Landscape Strategy Plan proposes mitigation including native woodland planting to the east of the Site, reinforcing the existing woodland planting, native tree planting around the Site and along sections of the proposed access road and new and reinforced hedgerow planting to create a buffer between the proposed siting of the infrastructure and the west of the Site. The extensive landscaping proposed will serve to reduce the visual impact of the development and reduce any perceived impact of encroachment on the countryside. Given the characteristics of the Site and the surrounding area, the level of encroachment is considered limited.
To preserve the setting and special character of historic towns	As there are no listed buildings, conservation areas or landscape designations within the immediate setting or local area, the proposal would have no impact on the setting or special character of historic towns.
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	The proposed use of the Site is a Battery Energy Storage System and its proximity to the POC is critical to the choice of location. The greater distance a BESS is from a link to the grid, the level of voltage drops when transferring electricity. Furthermore, urban land is often located in close proximity to residential properties which is a land use incompatible with a

	BESS. Urban land is also often within industrial estates which are an intensive energy use from the grid and therefore, there is often not enough capacity at the nearby POC to connect a BESS in this location also. The lack of available urban land for a BESS in close enough proximity to the POC is demonstrated in the ASA.
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- 7.23 Since use of an available area of land not within the Green Belt is not possible due to the lack of POC available with sufficient capacity in the District and the existing constraints within the Authority boundary, the area of search then focuses on land which then meets the other location criteria. The proposed location is preferable when considering all factors. Whilst the land is sloping, the proposal is sited at the lower level of the land and the layout has been designed to minimise visual impact and minimise tree and hedgerow loss. This form of development and proximity to the substation requires less construction and maintenance costs, maximising efficiency. The proposed access will follow the defined field boundaries of the adjacent field to the west to connect to Bemersley Road. The specific justification regarding visual impact is set out in the Landscape and Visual Impact Assessment, but it is considered the location is well screened and not visually intrusive.
- 7.24 The Application seeks consent for the BESS for a period of 40 years, and as such, any impacts to the Green Belt are not permanent and are entirely reversible.

Conclusion

- 7.25 Planning policy requires inappropriate development within the Green Belt to demonstrate that VSCs not only outweigh the harm by virtue of inappropriateness, but also any other harm.
- 7.26 Whilst it is acknowledged that the proposed development is inappropriate development and substantial weight is therefore applied to the openness of the Green Belt and the associated impacts of the development, the temporary lifespan and reversibility of impacts, together with the very limited impact and harm, should be given appropriate weight in the consideration of the application.
- 7.27 Given the substantial benefits the storage of energy provides, the proposed development is considered to fall within the development identified within NPPF paragraph 151. It is considered therefore, by virtue of its operational benefits, the Government's drive for renewable energy and a low carbon economy, the lack of alternative sites to accommodate the proposal, and an appropriate location which would not make a significant contribution to the 5 purposes of the Green Belt, that the above demonstrates the proposed development meets the very special circumstances required to outweigh the perceived harm to the Green Belt.

- 7.28 The Application is accompanied by a full suite of technical documents, which demonstrate that the development will not lead to 'other' harm. The technical reports cover matters such as highways and transport impacts, heritage impacts, agricultural land classification, biodiversity and flood risk. As noted from these documents and the remainder of this statement, the proposed development would not lead to any degree of harm in these areas, and for the purposes of satisfying Green Belt policy, it should be concluded that the proposed development does not lead to any harm over and above the harm by virtue of its inappropriateness.
- 7.29 The VSCs case outlined in paragraph 7.13 above is considered to be very robust and the significant benefits of the proposed development outweigh the temporary and reversible harm by reason of inappropriateness and any other harm. Therefore, VSCs exist to justify this development in the Green Belt.

Design Considerations

- 7.30 The design and layout of the BESS is driven by functional requirements, together with site characteristics and there is limited scope for revision, certainly in terms of the appearance of the storage container units and associated infrastructure such as the substations and transformers.
- 7.31 The design and layout of the scheme aims to ensure that maximum levels of efficiency can be achieved and is bespoke to the Site and its topography.
- 7.32 The battery cabinets are 2.3m in height and there is a small compound area that comprises of various infrastructure, the largest of which has a maximum height of 5.5m.
- 7.33 A landscaping plan accompanies the application which has been prepared having undertaken a Landscape and Visual Impact Assessment ('LVIA'), assessed the proposal from key viewpoints in the surrounding area, and ensuring that the visual impact is suitably mitigated.
- 7.34 Consideration has been given to the opportunities and constraints which exist in the area and the development has responded to these wherever possible to ensure that the most appropriate design has been taken forward.
- 7.35 There is a need to ensure that the Site is safe and secure to reduce theft and vandalism risk as well as protect passers-by. A 2m high palisade fence is proposed to be erected around the 132kV compound and a 2m high security deer fence is proposed around the whole Site to ensure the proposal is secure.
- 7.36 The design and layout takes into account the requirements for the proposed infrastructure whilst balancing the need to soften the visual impact of the BESS. Planting is proposed both to soften the edge of the development and to provide biodiversity enhancements. As such, the proposal accords with Policy SD2 and DC1 of the Local Plan.

3. Impact upon Residential Amenity

- 7.37 The nearest residential properties are located approximately 250m south west of the Site. The accompanying Noise Impact Assessment, undertaken by BWB, has assessed the background and ambient noise levels at the existing nearest noise sensitive receptors to the Site. The assessment concludes that operations associated with the development have the potential to result in a low impact at existing noise sensitive receptors during the daytime and night-time periods and therefore mitigation measures are not considered necessary. There should not be any adverse impacts on the amenity of any nearby residents in terms of noise.
- 7.38 Construction noise can be managed by a Construction Management Plan which can be secured via condition upon approval of development if the Councils deem it necessary, as these are accepted ways of mitigating temporary noise impacts.
- 7.39 In summary, the development will not have any detrimental noise impacts upon local residents when fully operational and will therefore accord with Policy SD2 of the Local Plan. In terms of during construction, it is considered that any noise impacts would be minimal and can be controlled through a Construction Management Plan and conditions if necessary.

4. Highways Safety

- 7.40 A Transport Statement is submitted with the application and includes an assessment of the local road network and vehicular movements associated with the development during construction and once operational, assesses the impact and outlines if mitigation is necessary.
- 7.41 HGV construction traffic will route to the Site taking Norton Lane of the A53. This then becomes Bemersley Road to the north which leads all the way to the application site via travelling north.
- 7.42 There are two distinctive elements to the scheme which has the potential to impact upon highways safety, the construction phase and the operational phase:
- Construction Phase - The construction phase of the development will lead to a temporary increase in traffic on the road network surrounding the Site for a temporary 36 week period. On average during this period, it is expected that the development will lead to an increase in traffic movements of 4-5 two-way vehicle movements per day which will have a minimal impact on highway capacity.
 - Operational Phase - During the operational phase of the development, there will be a de minimus increase in traffic volumes with operational traffic (one van) expected to access the Site on two occasions per month.
- 7.43 The proposed development accords with national and local planning policy requirements, safe and suitable access to the Site can be achieved by all modes, and the level of traffic associated

with the proposed development will not lead to a residual traffic impact to the existing operation and free flow of traffic on the adjoining highway network.

5. The Natural Environment

Agricultural Land Classification

- 7.44 An Agricultural Land Survey (ALS) has been undertaken by Land Research Associates and forms part of the Application submission. This assesses the quality of the land, comprising a total survey area of 1.8 hectares.
- 7.45 A summary of the classification of the land is set out in Table 7.1 below. The results show that the majority of the land quality is subgrade 3b whilst 10% of the land is subgrade 3a. The subgrade 3b land is of moderate quality with 10% of the land quality being classified as the 'best and most versatile' land in the PPG. However, this accounts for a very small portion of land and therefore, would not result in any significant harm.

Table 7.2: Agricultural Land Classification of the Site

Grade / Subgrade	Area (ha)	% of the Land
Subgrade 3a	0.2	10
Subgrade 3b	1.6	90
Total	1.8	100%

Landscape

- 7.46 A LVIA has been undertaken to assess the potential impact of the development on the landscape and is submitted in support of the application.
- 7.47 The Site is located within a shallow valley landscape that is influenced by its proximity to the existing settlement edge and overhead high voltage pylons. The Site is pastoral land, which at the time of the Site visit was rough grassland, with the field boundaries defined by a combination of post and wire fencing and fragmented native hedgerow with mature hedgerow trees. There is no public access to the Site, with a limited network of PRoW within the immediate setting and local area.
- 7.48 Pastoral land is a common feature in the immediate, local and wider landscape, and the field are grazed regularly, and as such is devoid of any notable internal vegetation and are therefore in low quality. The Site is enclosed by existing vegetation with the lower lying eastern part of the Site being more heavily screened by existing vegetation which results in the reducing the contribution the overall Site makes to the prevailing landscape character.
- 7.49 An assessment of the likely landscape and visual effects arising from the Proposed Development has been undertaken as well as a Green Belt Assessment.

- 7.50 The Site is small scale with a degree of enclosure currently provided as a result of the local landform alongside the mature vegetation structure within the immediate setting and local area. This results in reducing the Site's visual envelope from the outset. The character of the Site and the surrounding area is predominantly semi-rural, with notable urban influences from detracting features within the immediate and local area including existing dispersed settlement and overhead high voltage powerlines with associated large pylons. These elements instil an influence of infrastructure on the character of the Site itself.
- 7.51 It has been assessed that beyond the Site and its immediate setting, minimal adverse effects are likely to arise, ranging from Neutral to Minor Adverse, on the local and wider landscape character and visual receptors at Year 1. This is as a result of the current level of enclosure to the Site and the small scale and nature of the Proposed Development.
- 7.52 The Site is considered to make a very limited contribution to the purposes of the Green Belt. Moreover, due to the fundamental characteristics of the Proposed Development, including its impermanence and, the likely degree of harm is further restricted on the Green Belt and limited to the Site itself. It is considered this in accordance with national and local planning policy.
- 7.53 A Landscape Strategy Plan is proposed to mitigate the perceived impact. The mitigation measures proposed include native woodland planting to the east of the Site, native tree planting around the Site and along sections of the proposed access road, new and reinforced hedgerow planting to create a buffer between the proposed siting of the infrastructure and the west of the Site and a proposed wildflower meadow surrounding the proposed development.
- 7.54 The Site is considered to have the capacity to accommodate the Proposed Development without long-term unacceptable effects on landscape character and visual amenity, whilst the proposed landscape enhancements are deemed to have the potential for some long-term beneficial effects through the establishing proposed native grassland, hedgerow, hedgerow trees and woodland replacing / restoring lost or degraded characteristic features.
- 7.55 The submitted LVIA and Landscape Strategy Plan shows that that the impacts of the proposed development can be mitigated, in line with both the Development Plan in terms of policies SD2, DC1 and DC3 as well as the overall national approach to policy.

Ecology

- 7.56 The Application is accompanied by an Ecological Impact Assessment ('EcIA') which has been prepared by SLR. The appraisal assesses the ecological value of the site at present and noted the findings of a walkover survey that had been undertaken.

- 7.57 The Site is dominated by modified grassland, bordered by poor hedgerows to the north, south and west; hedgerows to the north and south in particular contain a number of gaps. A proposed access track extends westwards, to meet Bemersley Road, through another field of modified grassland.
- 7.58 The EcIA concludes that the impacts upon ecological features on the Site will be local or less than local. However mitigation is proposed based on the assessment of the Site to address impacts, the mitigation includes:
- Planting of 188 metres of native species rich hedgerow (including gapping up) and hedgerow trees to replace 82 metres removed to create a junction and associated visibility splay;
 - Provision of enhanced foraging and commuting opportunities, through planting of native species rich hedgerow with trees, the creation of 0.92ha of tussocky grassland and 0.27ha of new broad-leaved woodland;
 - The planting of new hedgerows, hedgerow trees and broad-leaved woodland and the creation of tussocky grassland will enhance the Site for birds;
 - Planting of new hedgerows and woodland strip will provide an enhanced habitat for badgers; and
 - Creation of a tall tussocky grassland will provide enhanced habitat for basking and hunting reptiles.
- 7.59 The proposed development is expected to provide an increase of 2.01 biodiversity units, from a baseline of 7.53 units to 9.54 units post installation, equating to a 26.75 % net increase. This will result in a net increase of nearly 190% for linear habitats. As such, it is clear that a significant increase in biodiversity units will result.
- 7.60 Therefore, the Site has been assessed appropriately in terms of its ecological value and there are no significant constraints that would prevent the installation of the BESS on Site. Furthermore, with the proposed mitigation measures including planting and landscaping, the proposals will result in a significant increase in biodiversity net gain.

Air Quality

- 7.61 The BESS will not give rise to any emissions which will impact upon air quality. Accordingly the Proposed Development is in accordance with the Framework and Policy SD2.

6. The Historic Environment

- 7.62 In order to assess the impact of the development, a Heritage Desk-Based Assessment ('DBA') has been prepared by SLR.

- 7.63 As set out in paragraph 2.4 of this Statement and the accompanying Heritage DBA, there are no designated or recorded non-designated heritage assets located within the Site and therefore, no designated heritage assets would be physically affected by the proposals.
- 7.64 There may be some non-designated heritage assets in the form of historical agricultural features located within the Site. However, the DBA notes that such features are unlikely to survive in good condition due to continued agricultural use of the Site.
- 7.65 The proposed development is also expected to result in **no harm** to the significance of designated heritage assets within the wider landscape including Grade II Church of St Anne. The DBA concludes that the key contributing heritage interests to the significance of those, and all other, heritage assets, and the ability to appreciate their significance, and all key views towards, from and including them, would be preserved.
- 7.66 Therefore, the proposed development has been suitably assessed and the proposals are considered to be consistent with the provisions of Section 66(i) of The Planning (Listed Buildings and Conservation Areas) Act (1990), paragraphs 199 – 202 of the NPPF (2021) and the relevant policies of the Staffordshire Moorlands Local Plan (Adopted 2020) including Policy SD2.

Archaeology

- 7.67 The accompanying Heritage DBA has found that any agricultural remains of post-medieval date would not be anticipated to comprise assets of the highest significance, nor to warrant preservation in situ or otherwise preclude development within the Site. The report does not rule out archaeological remains from earlier periods however, highlights that conditions on the Site make it unlikely that settlement or funerary remains would be present. As such, no significant impacts or impacts warranting an archaeological field response prior to determination or commencement of works are anticipated.

7. Site Specific Infrastructure

Ground Conditions and Contaminated Land

- 7.68 A Geotechnical and Preliminary Coal Mining Risk Assessment accompanies the planning application, prepared by South West Geotechnical.
- 7.69 The report highlights an extensive history of coal mining in the area with three coal seams shown to outcrop on the Site. In terms of the coal mining risk, there is a high, medium and low risk zones on the Site with the development moved during the preparation of the application to the low risk zone. As such, the underground coal workings are not considered a risk to the development.

- 7.70 The assessment also concludes that the ground conditions will provide an acceptable bearing stratum to support the development with a recommendation for concrete design.

Flood Risk Assessment and Drainage Strategy

- 7.71 A Flood Risk Assessment and Surface Water drainage Strategy has been prepared by SLR and accompanies the application.
- 7.72 Flood risk has been assessed in line with BS85333, taking account of national and local planning policy and guidance, and all potential sources of flooding to the Site have been considered.
- 7.73 A screening assessment has reviewed the flood risk posed by all potential sources including, tidal, fluvial, groundwater, sewer and water mains, reservoirs, canals and infrastructure failure. This concluded that further, detailed assessment of flood risk is not necessary, due to the low risk posed by the sources of flooding investigated in the screening study.
- 7.74 A Surface Water Drainage Strategy has been developed to control surface water discharge from the Site (and thereby downstream surface water flood risk) as well as mitigate against the impacts of climate change.
- 7.75 Two swales are proposed to mitigate impacts of changes in storm water runoff from hardstanding developments at the battery storage area and DNO substation compound area within the Site, including impacts to water quality.
- 7.76 This surface water drainage strategy will seek to mimic the existing runoff regime and ensure that there is no increase in peak discharge from the presence of impermeable surfaces. This will be achieved by introducing swales on the downgradient boundaries of the battery storage and the 132 kV compounds, connected by underground pipework. This system would collect surface water runoff prior to discharge into the shallow drainage ditch at the southeastern extent of the Site.
- 7.77 The conceptual surface water drainage strategy is shown in Appendix 04 which will attenuate and regulate flood flows prior to discharge. Modelling indicates that the swales are sufficient to avoid surface discharge from the Site up to the 1% AEP with a 20% uplift to accommodate for changes in storm severity associated with climate change over a projected 40-year development lifetime.
- 7.78 The proposed strategy will ensure that proposed development will not increase the flood risk elsewhere and the runoff will have no adverse impact on the water quality at the Site and surrounding area, including the point of discharge.

7.79 The proposed scheme would normally not be manned and therefore staff would only be present on the Site for routine maintenance. Due to the low level of flood risk associated with the Site, development of an Emergency Flood Response Plan (EFRP) is not deemed necessary for the Site.

7.80 The proposed drainage strategy is therefore acceptable and accords with the objectives of the NPPF (paragraph 167).

Benefits of the Scheme

7.81 The Framework makes clear that there are three limbs to sustainability – economic, social and environmental. It is therefore appropriate to consider the economic, social and environmental benefits which will be provided by the Proposed Development.

7.82 The economic benefits which will be delivered by the Proposed Development can be summarised as follows:

- Direct employment in the construction phase;
- Job creation in the supply chain and related services; and
- An uplift in GVA.

7.83 The environmental and social benefits arising from the proposed development include:

- Providing an important renewable energy storage resource for the district and at a national level;
- Sustainable construction, utilising recycled/recyclable materials for the construction of the development where appropriate; and
- The introduction of biodiversity enhancements and delivery of biodiversity net gain through the provision of new landscaping.

7.84 The public benefits of the scheme are clear, in that national guidance supports the provision of associated infrastructure for the storage of renewable energy. The development will help meet national energy objectives which are crucially important by adding to the UK's renewable energy capacity.

8.0 SUMMARY

- 8.1 Government policy strongly encourages the development of renewable energy schemes, for which there is an urgent need, providing that environmental issues are not adverse, and if applicable, appropriate mitigation measures implemented. Staffordshire Moorlands Council also recognises this as they declared a climate emergency in 2019 with a goal to become carbon neutral by 2030. BESS, which assist the national grid supply during times of high demand, are strongly supported for the role they can play in assisting with the efficient operation of renewable energy resources.
- 8.2 This Planning Statement demonstrates that the Proposed Development has been carefully designed to take account of national and local planning policies, the Site's opportunities and constraints. Furthermore, the environmental reports and assessments which accompany the Planning Application demonstrate that the Proposed Development will not have an adverse impact on the built environment, surrounding landscape, the natural environment, the historic environment, environmental or site-specific requirements.
- 8.3 The site is situated within the Green Belt and such renewable energy projects are deemed to be 'inappropriate' development, which by definition are harmful. As such, there is a requirement for the applicant to demonstrate 'Very Special Circumstances' should outweigh the harm by inappropriateness and any other harm.
- 8.4 This Planning Statement outlines a robust VSCs case and the many significant benefits that would arise as a result of the development and outweigh the limited harm. It is demonstrated that the BESS needs to be situated in this specific location, whilst also demonstrating the very limited harm to the Green Belt and its openness, whilst the technical documents accompanying the application also demonstrate that the development will not lead to 'other' harm.
- 8.5 The Proposed Development is clearly sustainable development that has the full support of the Framework and is compliant with and all other relevant planning policies, as demonstrated in Section 7.0 of this Statement.
- 8.6 Based on the evidence and justification set out in this Planning Statement and other supporting documentation, and in accordance with the Framework, it is respectfully requested that this application is approved, without delay.

APPENDIX A

Staffordshire Moorlands Council Screening Opinion (19 January 2022)