

Planning application SMD/2022/0076 – Construction of a temporary Battery Energy Storage System on land off Bemersley Road, BALL GREEN, Stoke on Trent

I wish to register my objections to the above planning application so that it is placed on record. I have seen the details and I know the site well as I live in the area in which it is proposed to be built. I wish to strongly object to the development of this site for the following reasons:

1. While the proposed site may fall under the boundary of Staffordshire Moorlands District Council the majority of those affected live in the village of Ball Green, which falls within the boundary of the City of Stoke on Trent, a Unitary Authority - this has been completely ignored by the applicant, with every reference talking about Staffordshire Moorlands.
2. This is inappropriate development of designated Green Belt within the city of Stoke on Trent. The National Planning Policy Framework Section 13, paragraph 137 clearly states "The government attaches great importance to green belts. The fundamental aims of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".
3. Development of this type and magnitude in our rural village is not consistent with local planning frameworks and will cause irrecoverable harm by allowing the merger of the outlying villages of Ball Green and Brown Edge – this is urban sprawl and cannot be excused by using the wording of "temporary construction" when the proposal is for 40 years.
4. The very special circumstances as required by the National Planning Policy Framework (NPPF) paragraph 147 for the development in the Green Belt ARE NOT MET by this application:
 - a. There are already Brownfield sites that have been identified particularly in the village of Ball Green, one just 850 metres away from this site. This is absolute evidence that there are no special circumstances to allow this development to proceed on Green Belt.
 - b. As the NPPF clearly states at paragraph 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". With other sites available in the immediate location there are no special circumstances for this to proceed.
 - c. The storage of electricity which is taken from the National Grid and then sold back to the National Grid is not increasing the production of energy from renewable sources.
5. The site itself is of significant value with the valley being home to various animals, flora and fauna and forms a natural corridor through which the River Trent flows from Knypersley reservoir into the city itself. The land also has feeders that connect to the Caudon Canal.
6. Battery storage units and related equipment are well documented to be a fire hazard, thus requiring access for emergency vehicles at all times. The proposed site would require a permanent roadway to be in situ for any fire service vehicles to access the actual battery units. It would also require a source of water. This is unacceptable in Green Belt.
7. Any fire would cause irreparable damage and pollution to the River Trent and Caudon Canal, this is a risk that cannot be overlooked.
8. Whilst energy storage is technology that may play a role in protecting our planet, we should be mindful that if we truly want green, we must look closely at the bigger picture, which includes:
 - a. The emissions and pollution created from the extract of materials
 - b. The production and transportation of these goods from overseas
 - c. The physical construction of these sites, including the extremely large quantities of concrete that are require
 - d. Consideration as to how these batteries will be disposed of during their lifetime when they will need to be replaced
 - e. And finally, in 40 years' time when they need to be decommissioned.

We must make sure we do not make poor short-term decisions.

9. At this moment in time there are no government regulations for these units and land owners and developers are looking to make money at the community's expense as we potentially lose our Green Belt forever.
10. Incidents of serious fire and explosions, which release toxic gases, at other battery storage units suggest that there is a danger to the public, increasing pressure on emergency services.
11. This site is also within close proximity of not one but two primary schools, one within Ball Green itself and one within Brown Edge.
12. Anesco's own provided information is flawed and contradictory:
 - a. They firstly state that the land in question falls within the village of Brown Edge, it does not it falls directly adjacent to the village of Ball Green in Stoke-on-Trent
 - b. They state that Ball Green is a suburb, we are not, we are a village, just the same as they describe Brown Edge.
 - c. They are picked up by Staffordshire Police for contradicting their own fence proposals, which are different in their Design and Access Statement than in their Planning Statement. Staffordshire Police state "it is rather unclear from the terminology and phraseology what is where. Indeed, the accompanying plans are inconsistent". This calls into question the accuracy of anything submitted by the company.
13. It is false to say that the proposal will be unseen as it will be screened through planting, when in fact that statement refers to the planting scheme as being effective once there 15 years of growth! What about the first 15 years of the site being seen by neighbouring properties.
14. Travel to and from the site during the 8 months of construction will see a large number of articulated lorries travelling through Norton in the Moors and Ball Green, Stoke on Trent
 - a. The roadway is extremely narrow in parts.
 - b. This is a main pedestrian area with many school children navigating the narrow pavements running this length of road.
 - c. The road passes by not only the main village shops, but a doctor's surgery, health centre and a children's park.
 - d. These are unacceptable safety hazards and cannot be allowed.
 - e. Anesco's own travel survey is extremely flawed as it has been conducted at a time of road closures and diversions, providing a very false benchmark in terms of the flow of existing traffic.
15. It will not only cause a safety hazard as articulated lorries navigate the narrow points and blind bends of Bemersley Road but will also damage the highways that are under the responsibility of Stoke on Trent City Council and NOT Staffordshire Moorlands District Council.
16. The removal of our hedgerows to create a "wide enough" access to facilitate the turning of articulated lorries in and out of the site is an unacceptable loss, and against Staffordshire Moorlands Local Planning policy (Sept 2020) which clearly states in Policy NE2 it will protect established Hedgerows by retaining them, unless the need for, and the benefits of, the development outweigh their loss. As there are alternative sites available this development does not outweigh their loss.

Finally, I wish to raise formally that Anesco **HAS NOT** carried out an "appropriate level of consultation" as it claims within its Statement of Community Involvement nor have local residents "been offered the opportunity to comment on the proposed development".

Yours sincerely

NAME S. MCINTYRE