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Ball Green
Stoke on Trent
ST6 8BB

3rd April 2022

Staffordshire Moorlands District Council
The Planning Department
Moorlands House
Stockwell Street
Leek
ST13 6HQ



For the Attention of

Dear Ms Jane Curley

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

We wish to register and formally place on record our ***strong objection*** to the above planning application. We are very familiar with the site in question as it is located on our own doorstep and, whilst we accept that this site may fall within the boundary of Staffordshire Moorlands District Council, we would argue that the majority of the people affected by any development off Bemersley Road do actually live in the village of Ball Green which falls within the boundary of the City of Stoke on Trent Council. The Applicant for whatever reason has chosen to ignore this fact in their submission.

The Applicant has stated in their proposal literature that:-

'We are keen to work closely with local residents to obtain their views and opinions of the proposed development as part of the planning process, and to identify beneficiaries for community benefit schemes'

We can confirm that we were one of the few households who actually did receive the Anesco leaflet and, as requested, we wrote to them on 16th January 2022 stating our concerns and also our belief that we could not envisage any collective benefits to local residents based on the information, or should we say lack of information, that had been provided in their leaflet. We also raised concerns that they had actually used COVID as an excuse for not holding a public consultation and we therefore asked that they respectfully bear in mind that all COVID restrictions were about to be lifted and would allow them to consider and act upon our concerns. We also requested that they should immediately take the opportunity to demonstrate that they were fully committed to undertake an open, honest and transparent consultation within the local community and yet, disappointingly, we have received neither an acknowledgement of our correspondence nor a response addressing our concerns.

For the record, we do support Renewable Energy but only when there are no detrimental impacts to both landscape and local neighbourhood, regrettably, this cannot be said of the proposed Ball Green BESS development off Bemersley Road and our objections follow:-

- Inappropriate development of designated Green Belt within the city of Stoke on Trent
- The NPPF clearly state ***“Government attaches great importance to green belts. The fundamental aim 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”***
- The very special circumstances as required by the NPPF paragraph 147 for the development in the Green Belt ***ARE NOT MET*** by this application.

There are already Brownfield sites that have been identified particularly in the village of Ball Green, one just 850 metres away from this site, and providing absolute evidence that there are no special circumstances to justify proceeding on Green Belt.

As the NPPF clearly states ***“When located in the Green Belt, elements of 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.

- The site 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 the Knypersley reservoir into the city itself. The land also has feeders that connect to the Caulden Canal.
- It will not only cause a safety hazard as articulated lorries navigate the narrow points and blind bends of Bemersley Rd and Knypersley Road through the village of Ball Green but it will also damage the highways that are under the responsibility of Stoke on Trent City Council and not Staffordshire Moorlands District Council.
- The removal of hedgerows to create an adequate entrance for the use of articulated lorries is both an unacceptable loss and is also contrary to Staffordshire Moorlands Local Planning Policy (Sept 2020) which clearly states in Policy NE2 that 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 proposed development does not outweigh their loss.
- Battery storage units and related equipment are well documented to be an internationally recognised fire hazard thus requiring access for any fire service vehicles to access the actual battery units. It would also require a source of water which is unacceptable in Green Belt.
- Uncontrolled release of the energy stored can result in a fire or explosion.
- Thermal runaway describes a chain reaction in which damaged battery begins to release energy in the form of heat. This leads to further damage and a feedback loop that can then result in rapid heating. Left unchecked that heat can cause a fire. The only way to stop thermal runaway is rapid cooling of the affected cells. Alternate recommendations are to “Simply” separate the affected battery module and allow the reaction to reach its destructive conclusion in a safe location!!!!!!!!!!!!!!!!!!!! Not in my back yard thank you.
- Large scale battery fires have occurred in almost every jurisdiction within BESS sites over the years;-

- South Korea 23 battery farm fires 2017-2019
 - Europe
 - North America Illinois, burned for 3 days and thousands of residents evacuated
 - Merseyside still burning after 11 hours
 - Australia (Hornsedale) built in 2017 and failed 4 years later
 - Felicity Ace, cargo ship fuelled by lithium batteries caught alight near The Azores February 2022 causing air pollution from toxic fumes and burned for 8 days.
- A battery fire is known to release noxious fumes and chemicals. According to Public Health England the highly toxic gases, Hydrogen Fluoride – lethal if inhaled and causes irreversible health effects after just one hour of exposure.

THE HAZARD IS INHERENT IN THE TECHNOLOGY

- Mail on Sunday in July 2021, Prof. Wade Allison, Emeritus professor of Physics at Oxford University stated that the rising number of sites, nearly 400 around the UK, could spell catastrophe:-

"It's like a potential bomb" he says. "When batteries catch fire you can't just squirt water on them and put out the flames. It's evident from our research that nothing has been done to tackle this problem".

"With the potential for huge explosions, fires and clouds of toxic gas these battery 'farms' could devastate towns and villages nearby"

"For farmers it's a bit more lucrative and for every £1,000 an acre they make, you may as well take off £1,000 on everyone's household"

To conclude, I will re-iterate that Anesco **HAS MOST DEFINITELY NOT** carried out an appropriate level of consultation as they claim within their Statement of Community Involvement nor have local residents been offered the opportunity to comment properly on the proposed development. I have herein made our objections known and we stand by every one of them. So far as the safety and inherent dangers of BESS sites are concerned we are no experts and therefore have no alternative other than to accept and support the findings/recommendations of those who are qualified experts on such matters.

There have to date been far too many large scale battery fires from existing BESS sites across the world and we now respectfully ask that both Anesco and SMDC provide some clear proven evidence that this technology is safe. We desperately need an evidenced response regarding an existing BESS site which clearly states an historic based safety record and **MOST DEFINITELY NOT** the current "assumed" safety statement.

Yours sincerely

Linda & Mike Brookes