

6 Heather View
Ball Green
Stoke on Trent
ST6 8BB

29th April 2022

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

For the attention of 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

I wish to formally put on record my strong objections to the above planning application. I have viewed the 25 documents containing 527 pages in order to understand what the applicant is proposing. I know the site extremely well as I live in adjacent to the area in which it is proposed to be built. I have noted that Heather View is indeed mentioned in several documents and yet Staffordshire Moorlands have failed to consult directly with those residents who reside here, despite knowing this. This needs to be rectified as soon as possible with all residents in Heather View and Farm Lea, Stoke-on-Trent written to individually and given the opportunity to be consulted.

I also want to point out that 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. Disgustingly the applicant has failed to recognise this and has simply submitted inaccurate paperwork. By example the Noise Assessment begins by stating that Ball Green Farm is in Brown Edge, this could be misleading to those in the Planning Department and the Planning Committee. Indeed, it could undermine what is supposed to be an open and transparent planning process. It clearly is not in the Staffordshire Moorlands and is a Stoke on Trent residency with in the village of Ball Green. Furthermore, the actual field that the applicant wishes to site this monstrosity on is in Ball Green too, with its only access via a Stoke on Trent highway. Consultation does not appear to have taken place with the City of Stoke on Trent Highways department and this too needs to be rectified.

I wish to **strongly object** to the development of this site for several reasons which I provide below:

Inappropriate Use of Green Belt

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”.

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.

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:

- 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 site is already being discussed with Stoke on Trent City Council for the same purpose. This is absolute evidence that there are no special circumstances to allow this development to proceed on Green Belt.
- 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.
- Anesco have openly admitted that while Brownfields sites exist their owners do not wish to sell or lease them – this is therefore not about availability of land, it is purely about convenience.
- 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, simply recycling those from other sources. This is NOT renewable energy. The equipment its materials and manufacture are in fact totally the opposite with disposal a major consideration as materials are mostly not recyclable.

Noise pollution:

The Noise Assessment document clearly states that noise associated with the development exceeds the prevailing background noise levels at the receptors closest to the southern point. The document does in fact mention just once in amongst its 32 pages that the reference noted as NSR2 is Heather View, my own street. However, throughout the document is then simply talks of NSR2, I fear a convenient way of hiding the fact that this in our home and we will be affected by noise!

It alleges that it has taken noise levels during December 2021 and then through modelling it has assumed what the noise levels will be. The difference then being the effect on ourselves. However, during December 2021 Bemersley Road saw a significant increase in traffic due to road works that closed the opposite end of the road at the junction with Knypersley Road and Ford Green Road, the main arterial route, and diverted traffic back along Bemersley Road, as the only exit out of Ball Green. This will affect the starting point of the noise monitoring which in effect will mean that the noise level differences will be even higher than reported.

That said at table 5.1 of the report it clearly states that the increase in noise from the proposal throughout the day will have an **ADVERSE IMPACT** on those in the NSR2 location. Worse still it goes on to say in table 5.2 that this will be a **SIGNIFICANT ADVERSE IMPACT** at night! Ridiculously at 5.13 the report concludes that “further consideration of mitigation is not warranted at this time. This is grossly misleading and an unacceptable loss of our private amenity.

Visual Impact

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 only once there 15 years of growth. It consists of seed raised 80-100 cm whips – the existing hedgerow is decades old and is shown on ancient maps, it cannot be claimed that this is replacing like for like!

While whips may grow to a reasonable height over a period of 15 years, they will be unlikely to hold any depth/thickness in this time. It cannot excuse the fact that a significant amount of an adult’s life span must

be spent before the development cannot be seen. What about the first 15 years of the site being seen by neighbouring properties and their occupants? This is a loss of amenity.

Separately it is claimed that the site cannot be viewed by those in Heather View, but the photograph used as evidence is taken from the highway itself and not from either the first or indeed second floors of our homes, where we would actually look at it from. It does not explore the views of others in the area.

It is also not evident until you go through all the documentation that the removal of 70 meters of established and ancient hedgerow will be removed from the edge of the highway. This is 70 metres of visual impact to every single user of that highway and has the potential in winter to cause more traffic disruption from snow that will drift across the roadway instead of gaining shelter from the hedgerow.

Construction risk

Travel to and from the site during the 8 months of construction will see approximately 2,280 articulated lorries (journeys) travelling through Norton in the Moors and Ball Green, Stoke on Trent. This is recorded as being for 6 days every week and will cause extreme safety issues as:

- The roadway is extremely narrow in parts
- It has a 7.5 tonne weight limit for a reason
- This is a main pedestrian area with many school children navigating the narrow pavements running this length of road
- The road passes by not only the main village shops, but a doctor's surgery, health centre and a children's park
- 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
- 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

These are unacceptable safety hazards and cannot be allowed.

Ecological Impact - Removal of Hedgerows

The removal of 77 metres of hedgerows to create a "wide enough, visible access" to facilitate the turning of articulated lorries in and out of the site; together with the 5 meters to extend the track into the actual field where the BESS is proposed is an unacceptable loss. It also demonstrates how difficult it will be to navigate such a narrow lane.

The removal of hedgerows is 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, development on this site does not outweigh their loss.

The report itself once again states that as there is not alternative site available that it does. This is utterly misleading as already said a competitor has already approached Stoke on Trent City Council with regards to a site less than 850 meters away from this site.

Ecological impact – biodiversity

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, so not only does this risk the biodiversity that the feeders provide; but any contamination from the site will have a significant impact on our water ways.

The report fails to mention that deer are frequent visitors to the site, something that wasn't evident from a desk top review! But only 2 days ago there was photographic evidence of them in the area of Tongue Lane and they are a well know visitor of Edge Lane, Stanley Road and their peripheral areas.

Agricultural Land Quality

This land is currently used for the grazing of cows. However, the assessment clearly suggests that the soil is Grade 3, described as "good to moderate quality agricultural land: Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield". This land could then be used for the purpose of crops and food production, its value as such should not be overtaken by the inexplicable reasons given by the applicant for this development on this site.

Shockingly the assessment is the only document that mentions that the development will in fact affect three separate fields, whereby there may be just narrow strips in two, but this should be made evident!

Fire Safety

Battery storage units and related equipment are well documented to be a fire hazard, with 38 reports worldwide, thus requiring access for emergency vehicles always. 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 when it is suggested that it will be there for 40 years!

Any fire would cause irreparable damage and pollution to the River Trent and Cauldon Canal, due to the natural topography of the field, this is a serious and irreparable risk that cannot be overlooked.

- 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.
 - The 2020 fire in Liverpool, threatened to engulf the area in a toxic flume of gas and took 59 hours to extinguish
 - Ridiculously efforts to put out the blaze were hampered after water hydrants proved "inadequate"; and firefighters initially mistook the battery cabins for refrigeration units – as per the report by Merseyside Fire and Rescue
- This site is also within such proximity of not one but two primary schools, one within Ball Green itself, less than a kilometre away and one within Brown Edge; residential care home settings in Norton Green; and more than 1,000 households in Ball Green alone.

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, allowing the loss of our Green Belt forever and the uncertainty of the residents who must live with this for the next 4 decades.

It is incomprehensible that Staffordshire Fire and Rescue have not been consulted on this matter and considerations given to the contents of an Emergency Plan for the area.

Heritage Desk based assessment

Within the Stoke on Trent boundary, and documented as the closest to the site, lies Chatterley Whitfield. This site is listed with English Heritage and yet no consultation is lodged with them? Instead a desk top review, undertaken on behalf of the company proposing this development and not an independent assessment, suggests there is no impact on the site.

With the known risk of fire and explosion it is incomprehensible that a site of this nature and in such proximity is simply disregarded by the applicant.

Green Technology

Whilst energy storage is technology that may play a role in protecting our planet, we should be mindful that if we truly want to be green, we must look closely at the bigger picture, which includes:

- The emissions and pollution created from the extract of materials
- The production and transportation of these goods from overseas
- The physical construction of these sites, including the extremely large quantities of concrete that are required
- Consideration as to how these batteries will be disposed of during their lifetime when they will need to be replaced
- And finally, in 40 years' time when they need to be decommissioned.

We must make sure we do not make poor short-term decisions. The proposal for a BESS on this site is just a very poorly thought through short term reaction.

Inaccurate information

Anesco's own provided information is flawed and contradictory. Here are just a few examples:

- 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
- They state that Ball Green is a suburb, we are not, we are a village, just the same as they describe Brown Edge.
- They answer the following in their own application.
 - Are there trees or hedges on the development site? – No, and yet there clearly are
 - Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character? – No, and yet there clearly are
 - Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)? - No, yet is adjacent to a water course, shown on their own submitted plans
 - How will surface water be disposed of? – sustainable drainage system – to where exactly?
 - Can the site be seen from a public road, public footpath, bridleway or other public land? – No, and yet it can be seen from a public footpath and the access road that they require will obviously be seen from the public road.
- 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".

These inaccuracies call into question the accuracy of anything submitted by the company.

Lack of Community Engagement

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", as they claim.

We were one of just a handful of households who did receive the Anesco leaflet, which is evidenced by the hundreds of individuals who have stood up and said they were not aware of the proposals and had not received a leaflet. Again, their approach was less than transparent and the errors evidencing their lack of attention to detail. For example, their leaflet stated the closing date for feedback was the 17th January 2002; and it contained a location plan with no identifiable roads or buildings on it and no grid reference – it basically could have been anywhere. At the time of its distribution, just prior to Christmas, I then had to

email them to establish where exactly the proposal was in order to comment. I wrote back to them on 16th January 2022 stating our concerns for a development of this nature on our doorstep; and our belief that we could not envisage any collective benefits to local residents based on the lack of information that had been provided in their leaflet.

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. In reality Anesco has completely ignored residents who live in Stoke on Trent and made it extremely difficult for any resident to comment from anywhere else in the city.

I therefore reiterate my extremely strong objections to this ill-conceived proposal.

Yours sincerely

Tracy Kirton