

Dear Mr Elvin,

I refer to your request for pre application advice and write to confirm my informal comments as follows:-

The proposal is to construct a battery storage facility with a maximum storage and export capacity of 280MVA on agricultural land immediately to the east of the Cellarhead sub station, totalling approx. 5.4 ha. The site would be accessed off the existing sub-station access road from Rownall Road.

The facility would consist of 112 battery containers each with an inverter and 56 transformers which it is said are arranged in a 'U' formation adjacent to each container. Also proposed is a 132KV DNO sub-station and 8 containers housing switchgear/meter room. The battery containers have dimensions typically 12m by 3m by 3m high. Transformers, feed pillars, sub-stations and control cabins will be no higher than 3m. The exact container unit is yet to be determined. The site would be enclosed by 2.4m perimeter fencing and inward facing infra-red CCTV. An internal service road and screen planting would be provided. The proposed point of connection is located at the existing sub-station to the west of the site, as shown in drawing SRE1119/01/1.

Below ground cabling will link the site to the point of connection on the local distribution network. The exact cable route is yet to be determined but the wayleave will be either over the same landownership as the proposal site or land owned by National Grid. The construction phase is expected to last 9-12 months and during peak periods there may be up to 30 staff on site, depending on the phases of the construction schedule. During the operational phase of the site, there will be no site-based staff and there will only be a requirement for routine inspections/maintenance by light goods vehicle approximately once a month. Service tracks are required within the site to provide vehicular access around the site as part of regular inspections and maintenance. The track will be approximately 4m wide and will be finished with compacted crushed stone. The proposal will have a lifespan of 35 - 40 years, after which all equipment will be removed from the site and the land will continue to be used for agriculture

Principle of development

The site lies outside of a settlement boundary. It is within the open countryside which is also Green Belt. Policy SS10 of the adopted Staffordshire Moorlands Local Plan sets out the strategy for the rural areas of the District such as this. It says that these areas will only provide for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside. In respect of the Green Belt it says that strict control will continue to be exercised over inappropriate development within the Green belt allowing only for exceptions as defined by government policy. Policy SS2 sets out the settlement hierarchy for the District and also confirms that the rural areas of the District comprises open countryside where development is normally unacceptable and Green Belt where further development is generally inappropriate.

The issues are therefore whether your proposal amounts to appropriate development in the Green Belt and whether there is an essential need for this development to be located in the countryside.

It appears from your Discussion document that we are agreed that the proposal amounts to inappropriate development in the Green Belt (GB) and therefore harmful by definition. Advice in the NPPF is that such development should not be approved except in very special circumstances (VSC). The NPPF goes on to say that LPAs must give substantial weight to any harm to the GB and that VSC will not exist unless the potential harm to the GB by reason of inappropriateness and any other harm is clearly outweighed by other considerations

In this case and in my view in addition to definitional harm there would be significant harm to openness, the essential characteristic of the Green belt arising from the scale of the operation, the containers themselves (including the transformers, switchgear, substation) and the 2.4m

fence which is proposed around the compound. It would undoubtedly have a strong urbanising impact on this part of the countryside. There is also some conflict with one of the main purposes of the Green Belt, namely assisting in safeguarding the countryside from encroachment albeit that you may argue that the proposal is 'temporary'.

It will be necessary therefore for you to demonstrate an almost unique set of considerations which together outweigh the GB harm. In this respect need alone would not be sufficient justification. You will need to show with evidence why the facility needs to be located here rather than in a less harmful location outside the Green Belt. As part of this we would also want to see details of any other sites you have considered around the Cellarhead substation and why these have been discounted. You may be aware that we are currently also considering two other Screening requests for battery storage facilities relating to the Cellarhead substation. We would also like to see evidence of the overall national picture to show where suitable Transmission stations have been identified. Presumably National grid or other body has done a piece of work to identify suitable sites at a national/regional level which would give this proposal some context and help us to understand the strategy. Any evidence of support from National Grid for this proposal should be provided.

In terms of the main issues other than Green Belt these as follows:-

1. Landscape and visual impact

Polices DC3 and NE2 seeks to protect and enhance the landscape including trees and hedgerows. It is difficult to see how 112 containers, 56 transformers, 8 switch units and a sub station enclosed by 2.4m fencing will have none other than a harmful landscape and visual impact in this countryside location, representing as it would an urban form of built development. The application will need to show if and how this impact can be mitigated to an acceptable level and to this end the application should be accompanied by a Landscape and Visual Impact Assessment (LIVIA) and detailed Landscaping scheme. A Tree report/ Arboricultural Impact Assessment will also be required given existing trees and hedgerows and the proposed development should be informed by this. As suggested in your Discussion document we are happy to agree viewpoints with you for the LIVIA.

Views from and impact on users from the public footpaths close to the site, Cheddleton 47 and 53 in particular should be included as part of this. The LIVIA should consider summer and winter views.

2. Noise and impact on residential amenity

Polices SD 4 and DC1 seek to prevent unacceptable noise pollution and protect residential amenity. There are a number of residential properties in the vicinity of the proposal. No noise information has been provided with this pre app. A Noise Impact Assessment should accompany the application to demonstrate that the proposal will not add to ambient noise levels or result in undue disturbance to the occupiers of nearby residential properties. I can put you in touch with the Environmental Health Officer to scope the assessment if that would help. A separate charge is made for pre app advice on environmental health matters.

3. Biodiversity

Policy NE1 seeks to conserve and enhance the biodiversity resources of the District by amongst other matters ensuring that all development seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. It also seeks to protect habitats and species of importance. To this end a Preliminary Ecological Appraisal will be required with the application and a Biodiversity Impact Assessment and metric.

4. Flood risk

Policy SD 5 seeks to reduce flood risk. It also promotes the use of sustainable drainage measures (SUDS). As the site area exceeds 1 hectare and will result in the loss of permeable surfacing a Flood Risk Assessment and drainage strategy should accompany the application.

5. Highways and access

Polices T1 and DC1 seeks to ensure that traffic from a proposal can be satisfactorily accommodated on the highway network. Full details of access and traffic movements should be provided and detailed in a Transport Statement and Construction and Environment Management plan. Although I note that there is reference to an existing access being used, the application will need to detail any alterations required to this or the entrance onto the road to facilitate the proposal. It does appear from the drawings that a connecting track will be required from the existing access road to the site and there is some reference in the supporting document to a temporary access routes. The status of this route needs to be clarified in the application and its impact factored in to any assessments – LIVIA, ecology, noise etc.

Other Matters

The site is shown to be within a Mineral Safeguarding area and therefore we will require a Mineral Safeguarding statement to address Policy 3 of the Minerals Local Plan. I note also that our system shows that there are a number of Listed buildings and heritage assets in the vicinity of the application site which need to be considered in a Heritage Assessment. (for example Rownall Farm and Barn, Ivy House farm and barn and Rownall Hall Park, a Landscaped Park recorded on the HER)

Light pollution particularly at night time can be very harmful in rural locations such as this. Lighting can impact adversely both on residential amenity, the character and appearance of the area including Green Belt openness and biodiversity (bats for example). A Lighting assessment should be provided. An Agricultural land classification assessment will also be required to assess the quality of the land.

A full list of our validation requirements can be found here

<https://www.staffs Moorlands.gov.uk/article/567/Apply-for-planning-permission>

These comments of course constitute informal Officer advice which would not prejudice the Council in the consideration of any future formal planning application although I hope they are of some help in steering you to the main issues at this stage. The Council's formal Screening response will follow in due course. In the meantime if I can help further please let me know.

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