

6 Heather View
Ball Green
Stoke on Trent
Staffordshire
ST6 8BB

20th May 2023

To whom it may concern

SMD/2022/0076 – Construction of a temporary Battery Energy Storage System

I **strongly object** to the approval of a Battery Energy Storage System on land that is in Ball Green, Stoke on Trent.

Having raised objections before I provide the following additional comments in response to additional information supplied by the proposer ANESCO and Environmental Health.

The Location Support Letter uploaded on 11th April 2023 is supposed to be their attempt at convincing the committee as to why this abhorrent structure should be sited on Green Belt. However, it, as usual, is full of inaccuracies and argues against itself!

Anesco state that there are 4 reasons that affect the siting of the BESS.

- Proximity to a connection point – it fails to make clear that any connection would require permission of Stoke on Trent City Council to dig across Bemersley Road, to access a sub-station at Chatterley Whitfield. This would require permission of the council and of course would further impact residents of the area
- There must be a willing landowner, but the land belongs to an owner in Stoke on Trent and not in the Staffordshire Moorlands
- It states it can only be built where there are no construction hazards and yet we have clearly shown that access to this land is only achieved through negotiating very narrow lanes, which have speed bumps and a 30-mph speed limit imposed for a reason – the area is highly populated, would mean passing a middle school and two nurseries, a local community shopping area, a children's play area as well as a residential area.
- It states that you must be outside an area of national beauty or a national park

So why Bemersley Road???

- Page 2 of this supporting letter states there are 4 substations identified in the whole of Staffordshire Moorlands, that are outside of the national park of Green Belt – so why choose this one that will impact very few Staffordshire Moorlands residents, whilst impacting hundreds who live in Stoke on Trent
- Page 2 also says its agreed connection point lies in Newcastle Under Lyme! Yet again absolute simple but impactful errors that question the credibility of Anesco
- But apparently Newcastle Under Lyme is heavily constrained by Green Belt making it unsuitable for development! So, what is the difference in arguing it can't be in Newcastle because of Green Belt, versus can be in Staffordshire Moorlands, despite it being Green Belt? It's all Green Belt and the National Planning Policy Framework is clear, there must be

unique and justifiable reasons for allowing it on Green Belt. I'll revisit this point again in my letter.

- At Page 3 apparently BESS are not compatible with built up residential areas and that putting acoustic barriers up is clearly inappropriate. So, what is Ball Green? We are a community living in a built-up residential area – and Staffs Moorlands Environmental Health have already confirmed on 23rd March that as residents we will ENDURE INAPPROPRIATE NOISE!

So, what is Staffordshire Moorlands Policy that can be used but affects Stoke on Trent residents and not your own? Allegedly your Local Plan, but Anesco openly admit its not being reviewed until 2025!

And they claim Staffordshire Moorlands need to be consistent with its approval for this because it has previously approved a BESS in Cellarhead! However, as Anesco point out, every single application needs to be taken on its merit in terms of approval or refusal. So, let's consider some other facts. Anesco are currently appealing an application in Walsall that was thrown out because it was on Green Belt and it was clearly inappropriate for the site. So maybe Staffs Moorlands need to reflect and consider what other Local Authority are refusing?

And finally, Anesco are claiming that a BESS cannot be built on land immediately adjacent to the substation, near to Chatterley Whitfield but in an area that is under Stoke on Trent City Councils control. It's interesting that Anesco are claiming this when the application is still awaiting decision, as seen on Stoke on Trent's Planning portal. From those consulted, which are many, there is a published group of documents from English Heritage. Now surely, they are the only ones that could claim it should be rejected because of the site being of major importance. English Heritage are NOT opposed to this area being developed.

The argument about location is NOT robust and goes totally against the National Planning Policy Framework as there is no justifiable reason for it to be built on Green Belt. I would suggest that given Staffordshire Moorlands has already approved a BESS within its own boundaries it should be satisfied that at this point it has met its own Local Plan. Any development approved in such proximity to residents of Stoke on Trent, given the known information regarding impact, location and noise could only be seen as maverick against its neighbouring authority and about putting its own residents above those in Stoke on Trent.

As mentioned earlier Staffordshire Moorlands Environmental Health clearly agree with those of us who live in proximity to the site in that the noise we will have to endure is **inappropriate noise**. It is not characteristic to the area, which is open, quiet, and rural. They go on to say that the noise will be especially noticeable on still evenings and nights and yet we have the Human Right to the peaceful enjoyment of our homes (which includes are gardens). The officer making the report makes mention of consulting Stoke on Trent City Council because we are residents of theirs, but this is not a decision that should be made by the Council as a whole and our own Elected Ward Members have already raised their objections to this development, as has our Local Member of Parliament.

Finally, the officer talks about noise mitigation proposed and clearly states it still predicts noise increase over background noise! Ironically living on the edge of Staffordshire Moorlands is not a positive place to be as when they are making decisions for their residents, they do not consider the impact on us. When noise complaints are raised, and light pollution recorded and reported the same Planning department dealing with these approvals fails in its duty of care to act on the complaints raised and the noise and light pollution remains. Unfortunately, this brings with it

additional evidence as to why this proposal must be rejected in the first instance as officers will not respond to complaints raised afterwards.

In summary I once again urge you to refuse this application.

Yours sincerely

Tracy Kirton