Environmental Impact Assessment Screening Report.

Land at Newfields Farm, Rownall Road, ST9 OBS.

On behalf of Newfields BESS Ltd.

Date: 28/06/2023 | Pegasus Ref: P23-0415

Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
Draft	22/03/2023	EB	SD	-
V1	28/03/2023	EB	SD	Minor updates
V2	14/06/2023	EB	SD	Minor updates
V3	28/06/2023	EB	SD	Updated following client comments

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1. Introduction

1.1. Pegasus Group on behalf of Newfields BESS Ltd ("the Applicant") seek a formal Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations") in respect of an application for a development on land at Newfields Farm, Rownall Road, Staffordshire ("the Application Site or Site"). This report accompanies the request to Staffordshire Moorlands District Council (SMDC) to adopt a Screening Opinion to determine whether the proposed constitutes EIA development.

1.2. It is the intention that the application will be submitted in support of a Battery Energy Storage System (BESS) with a capacity of up to 99.9 MW and associated equipment and infrastructure.

1.3. A Site Location Plan is included at **Appendix 1**.

1.4. This Screening Report summarises the baseline conditions of the Site and identifies key environmental characteristics of the Site. This is in order to determine whether there is a likelihood of significant environmental effects as a result of the Proposed Development and to enable an informed decision to be made on the requirement for EIA.

1.5. Provision for the request of a Screening Opinion from an LPA is made within Regulation 6 of the 2017 EIA Regulations, which states:

(1) "A person who is minded to carry out development may request the relevant planning authority to adopt a Screening Opinion.

(2) A person making a request for a screening opinion in relation to a development where an application for planning permission has been or is proposed to be submitted must provide the following:

(a) A plan sufficient to identify the land;

(b) A description of the development, including in particular:

i) A description of the physical characteristics of the development and, where relevant, of demolition works;

ii) A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

(c) A description of the aspects of the environment likely to be significantly affected by the development;

(d) To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:

i) The expected residues and emissions and the production of waste, where relevant; ii) The use of natural resources, in particular soil, land, water and biodiversity;

(e) Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment."

1.6. As required by the EIA Regulations, the request for a Screening Opinion is accompanied by the information listed above.

1.7. It is relevant to acknowledge that a previous planning application was submitted by the Applicant for the Site (reference SMD/2022/0180) for the "*development of a Battery Energy Storage System (BESS) with ancillary infrastructure, security fence, access, landscaping and biodiversity enhancements, to provide balancing services to the local electricity grid*". This application was subsequently withdrawn on the 6th of December 2022, further discussion on the planning history is included in this report. As part of this application a screening request was submitted to SMDC on the 24th of December 2021 (reference SMD/2021/0853). A formal screening opinion was not provided by the council and the request is stated as 'still awaiting decision' on the Council's planning portal. The previous screening request did not consider the proposals to be EIA Development, and it is also relevant to acknowledge the previous planning application was accompanied by technical reports which provide relevant information which has been reviewed and considered in the writing of this Screening Report. The previous application was validated and there was no request from the council for an EIA to accompany the application following its submission.

Requirement for EIA

1.8. In order to determine whether the Proposed Development constitutes 'EIA development', regard must be had for the EIA Regulations and supporting Planning Practice Guidance (PPG)[1]. EIA development is defined by the EIA Regulations as development: "*likely to have significant effects on the environment by virtue of factors such as its nature, size or location*".

1.9. The procedures for carrying out EIA of a development project are set out within the EIA Regulations. The EIA Regulations require that for certain projects, an EIA must be undertaken. Schedule 1 of the 2017 Regulations lists developments that always require EIA. Schedule 2 of the EIA Regulations lists developments that may require EIA if it is considered that they could give rise to significant environmental effects. In deciding whether a Schedule 2 development requires EIA, Regulation 5(4) of the EIA Regulations states:

"Where a relevant planning authority or the Secretary of State has to decide under these Regulations whether Schedule 2 development is EIA development, the relevant planning authority or Secretary of State must take into account in making that decision:

(a) any information provided by the applicant;

(b) the results of any relevant EU environmental assessment which are reasonably available to the relevant planning authority or the Secretary of State; and

(c) such of the selection criteria set out in Schedule 3 as are relevant to the development".

1.10. As required by the EIA Regulations, this request for a Screening Opinion is accompanied by;

- A plan sufficient to identify the land (refer to **Appendix 1**)
- A description of the Proposed Development (refer to section 2 of this report)

[1] Environmental Impact Assessment - GOV.UK (www.gov.uk)

- A description of the aspects of the environment likely to be significantly affected by the development and a description of any likely significant effects of the Proposed Development on the environment against the EIA Screening Criteria as set out in Schedule 3 of the EIA Regulations (refer to section 3 of this report).

1.11. Once a Local Authority is in receipt of a request for a Screening Opinion, the EIA Regulations state that a Screening Opinion should be adopted within three weeks of receiving a request or such longer period, not exceeding 90 days from the date on which the request was made. Accordingly, we request that SMDC provides a Screening Opinion with details of the reason for their decision within three weeks of receipt of this report.

2. Description of the Site and the Proposed Development

Site Location

2.1. The Site extends to approximately 2.5 hectares (ha) and is currently comprised of agricultural fields used for the purposes of grazing, and the access track for Newfields Farm, the fields are bounded by hedgerow vegetation and trees. The Site is bounded to the north and east by the existing 132kV Cellarhead Substation, to the south-east by Newfields Farm with woodland and agricultural fields beyond, and to the south and west by agricultural fields, a drainage ditch is located adjacent to the western boundary.

2.2. The Site is located entirely within the administrative boundary of Staffordshire Moorlands District Council. It is located c. 1.3 km north of the village of Werrington and c. 6.2km west of the city of Stoke-on-Trent.

2.3. The Site's location is shown edged in red on the Site Location Plan included in Appendix 1.

Site Context

2.4. The Site itself is not within any statutory or non-statutory designation for nature conservation, nor are there any European designated sites within 10km of the Site boundary. In terms of nationally designated statutory sites the following are located within the area surrounding the Site:

- Wetley Moor Site of Special Scientific Importance (SSSI) c. 1km south-west;
- Churnut Valley SSSI c. 3.7km south-east; and
- Hulme Quarry SSSI and National Nature Reserve (NNR) c. 4.2km south-west.

2.5. The Site is located within the Impact Risk Zone (IRZ) for Wetley Moor SSSI, however the development is not of a type listed within Natural England's risk categories for this IRZ[2]. It is acknowledged however that Battery Energy Storage Systems are not mentioned in the user guide. There are no locally designated or non-statutory designated sites located within 2km of the Site boundary.

2.6. The Site is not located within or near an area with any statutory or local designations for landscape features. The Site is located within the Stoke-on-Trent Green Belt. According to Natural England's Provisional Agricultural Land Classification (ALC) Map the Site is within ALC Grade 4 which is considered poor quality agricultural land with severe limitations which significantly restricts the range and level of yield of crops.

2.7. The topography of the Site ranges between 220m AoD to 240m AoD rising from the west towards the east. There are two public rights of way (PRoW) which bound the Site, footpath

[2] Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance, April 2021.

Cheddleton CP 48 runs in a south to north direction along the eastern boundary and footpath Cheddleton CP 60 runs east to west along the southern boundary of the Site.

2.8. The Site itself is not located within an Air Quality Management Area (AQMA), the closest AQMA to the Site is the Stoke-on-Trent AQMA designated for Nitrogen dioxide levels, located c. 2.9km west.

2.9. The Site is located over 1km away from any settlements, however there are individual farmsteads in the surrounding area including Newfields Farm adjacent to the south-east boundary, Bungalow Farm c. 600m east and New House Farm c. 800m west of the Site boundary.

2.10. There are no designated heritage assets located within the Site boundary, within the area surrounding the Site there are the following heritage assets:

- Scheduled Monument Moated site and pond at Moor Hall Farm (reference 1007622) c. 1.7km north; and
- Grade II Listed stables to Rownall Hall (Hall now demolished) (reference 1188808) c. 800m north-east.

2.11. According to the Environment Agency's Flood Map for Planning the Site is located entirely within Flood Zone 1 which has the lowest probability of flooding. The majority of the Site is of very low risk of surface water flooding, along the western boundary which runs adjacent to the drainage ditch there is a medium risk of surface water flooding.

The Proposed Development

2.12. The proposals consist of a battery energy storage system and associated infrastructure and equipment, with a capacity of up to 99.9 MW. Whilst the proposals are still developing at this time, they are likely to consist of:

- 132/33 kV switchyard
- 14x battery energy storage racks
- 14x skid solutions (inverters and transformers) next to each battery energy storage rack
- 1x auxiliary transformer
- 1x customer switch room
- 1x customer store building
- 1x customer control building
- 1x DNO control building
- 1x DNO store building
- CCTV cameras

- Perimeter fencing around the BESS compound
- Access road, internal roads, and visitor car parking spaces

2.13. Access for the proposals will be taken from the existing farm access track from Newfields Farm. The existing access track will be updated and widened to accommodate the construction traffic and a new area of track will be provided to the south of Newfields Farm to connect to the existing track and provide access to the Site.

2.14. The proposals will connect to the to the existing Cellarhead substation and the grid connection works will be outside of the Site boundary and would be undertaken by an Independent Connection Provider.

Planning History

2.15. A previous planning application was submitted by the Applicant for the following:

- Application reference SMD/2022/0180 for development of a Battery Energy Storage System (BESS) with ancillary infrastructure, security fence, access, landscaping and biodiversity enhancements, to provide balancing services to the local electricity grid. This application was withdrawn on 6th of December 2022.

2.16. As part of the above application, a screening request was submitted to SMDC on the 24th of December 2021 (reference SMD/2021/0853). The previous screening request did not consider the proposals at that time to be EIA Development and the planning application was accompanied by separate technical reports only. A formal screening opinion was not provided by the council, however the previous application was validated and there were no requests from the LPA for an EIA to accompany the application on its submission.

2.17. The technical reports submitted with the previous application, and subsequent discussions with consultees, provide relevant information which has been considered in the design of the subject Proposed Development and within the writing of this Screening Report. Specifically, Landscape and Visual and Noise were areas of concern raised for the previous application. A Landscape and Visual Impact Assessment and Noise Assessment will be submitted in support of the planning application which will detail updated assessment and mitigation measures such as acoustic attenuation measures and an updated landscape planting strategy to ensure no significant effects on the environment. As with the previous application, it is not considered that this proposal constitutes EIA development, especially given even further measures are incorporated into the Proposed Development to avoid significant effects and reduce any non-significant effects further.

2.18. It is also acknowledged that two screening opinions provided for BESS schemes located in the area surrounding the Proposed Development were determined as non-EIA development. These include:

- Application reference SMD/2021/0496 for a solar farm of 1.5MW with a battery storage capacity of 57MW location on land at Greenfields Farm
- Application reference SMD/2021/0413 for a battery storage facility with a capacity of 280 MVA located on land adjacent to Cellarhead Substation

- Application reference SMD/2021/0691 for a battery storage facility with a capacity of 50MW located approximately 6.4km north-west of the Site.

Cumulative Schemes

2.19. A search of the SMDC planning portal has been undertaken with a 3km search radius going back 5 years around the Proposed Development. The following cumulative schemes have been identified:

- Application reference SMD/2022/0444 for the erection of a flexible energy facility on land east of Cellarhead Substation and west of Rownall Road approximately 500m north-east of the Site. This application was granted on the 22/12/2022 (re-submission of refused application SMD/2021/0695 for the same proposals).

- Application reference SMD/2022/0548 for the erection and operation of a Battery Energy Storage System and associated infrastructure and equipment with a capacity of up to 280 MVA. Located approximately 300m east of the Site on land adjacent to Cellarhead Substation, Rownall Road. The application is currently awaiting decision (re-submission of refused application SMD/2022/0047 for the same proposals).

- Application reference SMD/2021/0694 for the development of 75 new dwellings, new access, provision of green infrastructure and all associated works. Located approximately 1.6km south of the Site on land at Ash Bank Road, Werrington. Permission granted on 26/09/2022 and construction has not yet started.

- Application reference SMD/2022/0574 for the erection of storage containers, support infrastructure and security fencing for battery energy storage facility along with landscaping and all associated works. Located approximately 800m south-west of the Site on land adjacent to Armshead Farm, Armshead Road. This application is currently awaiting decision.

2.20. It is also acknowledged that a screening request was submitted (reference SMD/2021/0496) for a solar farm of approximately 1.5MW with energy storage capacity of up to 57MW on 4.25 hectares of land at Greenfields Farm located approximately 300m south-east of the Site. The screening opinion determined this to be a non-EIA development, and as no formal planning application has yet been submitted for this it is not considered a committed or approved development, however it has been considered within the cumulative assessment for robustness. The location of four identified cumulative battery storage schemes in relation to the Site are shown on the plan included within Appendix 2.

2.21. None of the above listed cumulative schemes are considered to result in significant cumulative effects, and no other cumulative schemes have been identified which would result in significant effects. The cumulative assessment is provided in more detail in Section 3 below.

3. EIA Screening Assessment

3.1. In assessing whether an EIA is required to assess the Proposed Development a thorough screening analysis has been undertaken, taking into account the requirements of Schedule 3 of the EIA Regulations. The screening analysis gives consideration to the following;

1) Is the Proposed Development a type listed in Schedule 1?

2) If determined not to be Schedule 1 development, is the Proposed Development a type listed in Schedule 2?

3) Is the site located within a 'sensitive area' as defined by the EIA Regulations?

4) Is the Proposed Development likely to lead to significant effects on the environment?

3.2. The screening analysis is presented below with reference to the EIA Regulations and supporting PPG.

1) Is the Proposed Development a type listed in Schedule 1?

3.3. For Schedule 1 Developments EIA is mandatory, the Proposed Development is not of a type listed within Schedule 1 of the EIA Regulations.

2) If determined not to be Schedule 1 development, is the Proposed Development a type listed in Schedule 2?

3.4. The Proposed Development is of a type listed in Schedule 2 and falls in Class 3 'Energy Industry', Subsection (a) 'Industrial installations for the production of electricity steam and hot water (unless included in Schedule 1)'. The EIA Regulations identify a series of thresholds for Schedule 2 projects to assist with establishing whether the potential for significant environmental effects exists such that an EIA would be required. The EIA Regulations state that for 'Industrial installations for the production of electricity steam and hot water' an EIA may be required for developments that 'the area of the development exceeds 0.5 hectares. The Site area exceeds this threshold as it has an area of 2.5 ha. The Proposed Development therefore constitutes a Schedule 2 development and this screening assessment has been prepared to determine whether the Proposed Development would be likely to result in significant environmental effects which would trigger the need for EIA.

3.5. Paragraphs 057[3] of the PPG provides guidance to help determine whether significant effects are likely. In general, it states that the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. Table 1 below sets out the indicative criteria, threshold and key issues to be considered as identified in the PPG.

[3] Paragraph: 057 Reference ID: 4-057-2070720

Table 1: Indicative Screening Threshold

Development Type	Indicative criteria and threshold	Key issues to consider
(a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1);	Thermal output of more than 50 MW. Small stations using novel forms of generation should be considered carefully.	Level of emissions to air, arrangements for the transport of fuel and any visual impact.

3.6. Consideration is given to the types of impact including the potential increase in traffic, emissions and visual impact.

3) Is the site located within a sensitive area as defined by the EIA Regulations?

3.7. Sensitive Areas are defined in the EIA Regulations as:

- Sites of Special Scientific Interest (SSSI) and European-designated Sites;
- National Parks, the Broads, and Areas of Outstanding Natural Beauty; and,
- World Heritage Sites and Scheduled Monuments.

3.8. The Site is not located within or in close proximity to a sensitive area as defined by the EIA Regulations. Within the area surrounding the Site there are three SSSI including Wetley Moor SSSI (c. 1km south-west), Churnut Valley SSSI (c. 3.7km south-east) and Hulme Quarry SSSI (c. 4.2km south-west). Due to the distance from Churnut Valley SSSI and Hulme Quarry SSSI and due to intervening built form, such as the A520 and the A52 no significant effects are likely. The Site is located within the Impact Risk Zone for Wetley Moor SSSI; however, the development is not of a type listed within the risk categories for this zone, although it is relevant to acknowledge that battery storage projects are not listed within Natural England's user guidance. Furthermore, a Preliminary Ecological Appraisal (PEA)[4] which was submitted in support of the previous planning application (ref SMD/2022/0180) found the Site does not provide any supporting habitat for Wetley Moor SSSI, and the Site is separated from this SSSI by agricultural fields and Armshead Road. Therefore, significant effects on SSSI in the area surrounding the Site are considered unlikely.

3.9. The Scheduled Monument Moated site and pond at Moor Hall Farm is located c. 1.7km north of the Site and due to the distance and the undulating topography of the Site and the surrounding area no significant effects on this Scheduled Monument are likely.

4) Is the Proposed Development likely to lead to significant effects on the environment?

3.10. Schedule 3 of the EIA Regulations states that when determining whether EIA is required, the characteristics of the development, the sensitivity of the area to be affected and the

[4] Phlorum, 2021, Preliminary Ecological Appraisal: Newfields Farm, Wetley Rocks.

characteristics of the potential environmental effects must be considered. These factors should be taken into account as part of the screening process and are set out below:

Characteristics of the Development

a) the size and design of the whole development

3.11. As stated above, the Proposed Development is Schedule 2 development, Class 3 'Energy Industry', Subsection (a) '*industrial installations for the production of electricity, steam and hot water (unless included in schedule 1)*'. The threshold for which is the area of development exceeds 0.5ha, the Site area exceeds this threshold at c. 2.5 ha in size and therefore the Development is classed as a Schedule 2 development. The proposals are however, limited to the storage and distribution of electricity to the national grid rather than the production of electricity.

3.12. Landscape planting will be embedded into the design of the proposals to help assimilate the development into the surrounding landscape. Vegetation present within the Site will be retained where possible and will be enhanced through measures which are likely to include bat and bird boxes, maintaining wildlife corridors and through the prevision of additional tree and shrub planting. These measures will also ensure a biodiversity net gain is achieved on Site.

3.13. The development will utilise the existing farm access track to the east for Newfields farm which is taken from Rownall Road as a means of access to the Site, with a new area of access track required around the farm buildings. The existing access track will be widened to allow for HGVs to use the route safely. The Transport Statement[5] submitted with the previous application undertook swept path analysis which demonstrated that the access route and site access can accommodate HGV movements safely during the construction period.

3.14. As the proposals are still developing two options are currently being explored for the PRoWs which bound the Site, these will either be maintained on their current alignment or diverted, however this is subject to detailed consideration to the landscape strategy and well as discussions with the LPA. It is noted that the PRoWs are currently overgrown, and the proposals will seek to improve access to these.

3.15. The Proposed Development is reversible in nature and after a period of 40 years would be restored back to agricultural use.

b) cumulation with other existing development and/or approved development

3.16. The EIA Regulations state that consideration should be given to "*other existing and/or approved projects*" (Schedule 4, paragraph 5(e)). This is further supported by the PPG which states "*There are occasions…..when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development*[6] *"*.

[5] APEX Transport Planning, 2022, Newfields Farm BESS: Transport and Access Statement.
[6] Paragraph: 024 Reference ID: 4-024-20170728

3.17. A search of the SMBD planning portal has been undertaken for a 3km search radius going back five years and has identified other four battery storage schemes within the surrounding area, the locations for which are shown on the pan included in Appendix 2 and one residential scheme as detailed in paragraph 2.19 of this report. It is acknowledged that not all of the identified other battery storage schemes are committed development with only application reference SMD/2022/0444 having received planning permission, with application references SMD/2022/0548 and SMD/2022/0574 currently awaiting decision and application reference SMD/2021/0496 at the screening stage with no formal planning application submitted. However, for robustness all of these battery storage schemes have been considered within the cumulative assessment. The identified schemes are not considered to result in significant cumulative effects, to demonstrate this a cumulative assessment has been undertaken and provided in **Table 2** below.

Table 2: Cumulative Assessment

Technical Topic	Cumulative Effects
Socio Economics	The Proposed Development in combination with the identified cumulative schemes may lead to a temporary beneficial effect through the creation of temporary construction jobs during the construction phase. However, due to the nature of the Proposed Development and the identified cumulative schemes, no significant cumulative effects are anticipated. The three battery storage schemes proposed within 1km of the Site will not lead to large increases in permanent employment and the other identified scheme is for a residential development and therefore is unlikely to have significant effects on socio economics in-combination with the Proposed Development due to the nature of the proposals.
Landscape and Visual	The Proposed Development would present a change in the land use, however this is considered localised and due to the size of the Site and the landscape planting proposed as part of the design if the development, this would not result in effects upon the wider character area. The three battery storage schemes in the area surrounding the site also propose landscape mitigation in the form of new woodland and new hedgerow planting which help to screen views into these developments and assimilate the proposals into the wider landscape. With this mitigation in place coupled with landscape mitigation embedded into the design of the Proposed Development significant cumulative effects on the wider landscape are considered unlikely. The residential scheme identified within the cumulative schemes (ref SMD/2021/0694) is for a small scheme of 75 dwellings located c.1.6km south of the Site. Due to the nature and size of this scheme and the small size of the Proposed

	Development couple with the undulating topography of the surrounding area significant cumulative effects are unlikely.
Ecology and Nature Conservation	There are no statutory sites located within the Site itself, within the surrounding area there is Wetley Moor SSSI (c. 1km south-west), Churnut Valley SSSI (c. 3.7km south-east) and Hulme Quarry SSSI and NNR (c. 4.2km south-west). Due to the distance between, and the Site sharing no interconnecting habitat with any of these sites, significant effects are considered unlikely as a result of the Proposed Development. Within the submitted documents for the identified cumulative schemes no significant effects on designated sites were identified, and due to the distance from these schemes and no linking habitat shared between it is considered significant cumulative effects are unlikely. All of the identified cumulative schemes propose landscape and biodiversity strategies to improve and create new habitat as part of their proposals. Due to the small Site area and limited ecological presence within the proposed Site no significant effects are anticipated upon species composition or ecology in-combination with the identified cumulative schemes.
Cultural Heritage	There are no designated heritage assets located within the Site itself, within the area surrounding the Site there is a Scheduled Monument (c. 1.7km north) and the Grade II Listed stables at Rownall Hall (c. 800m north-east). Due to the size and nature of the development and the existing topography, intervening development and woodland significant effects on these heritage assets are unlikely as a result of the Proposed Development. Furthermore, in combination with the cumulative schemes identified significant effects are not anticipated due to the distance between the identified cumulative schemes and these heritage assets and also due to the intervening development and woodland.
Flood Risk and Drainage	The Proposed Development is not located within an area at risk of flooding from fluvial sources, and the majority of the Site is of very low risk from surface water flooding with the exception of the western boundary which is of medium risk of surface water flooding. Due to the size of the area of medium risk of surface water flooding and due to the nature of the proposals the risk of flooding is considered low[7]. Significant effects on flood risk are not likely as a result of the Proposed Development. As such, significant cumulative effects in-combination with the identified cumulative schemes is unlikely.

[7] KRS Environmental, 2022, Flood Risk & Surface Water Drainage Assessment

	As the Proposed Development is reversible it would not lead to a permanent increase in impermeable surface area and would therefore not increase flood risk on the Site or in the surrounding areas.
Transport	Due to the size and nature of the Proposed Development no significant impacts on the highway network are likely. There would be an increase in traffic to the Site associated with the construction period however this would be temporary. Once operational the facility will be unmanned apart from occasional maintenance visits. The three identified battery storage schemes would also lead to a temporary increase in traffic during construction and once operational levels of traffic movement to these schemes would be minimal and therefore no significant cumulative effects are likely. Furthermore, the other identified cumulative schemes are supported by Transport Statements which demonstrate the developments can be accommodated within the local highway network.
Air Quality and Noise	As noted above, the Proposed Development in combination with the identified cumulative schemes can be accommodated on the local highway network. There will be a small increase in traffic using the local highway network during the construction of the proposals and once operational the site will be accessed by the occasional maintenance vehicle. Noise mitigation in the form of an acoustic fence is included within the proposals for the Proposed Development, similarly the other battery schemes within the vicinity also proposed similar mitigation and would not result in significant increase in noise levels. Due to the distance from the Proposed Development to the identified cumulative schemes significant cumulative noise effects are unlikely.

3.18. As set out above, no cumulative schemes have been identified which could result in likely significant effects.

c) the use of natural resources, in particular land, soil, water and biodiversity

3.19. The construction phase of the Proposed Development will use resources in terms of land, water and energy as would be expected for a development of this type. However, the Applicant will commit to include measures in a Construction Environmental Management Plan (CEMP) to minimise the consumption of natural resources, particularly those which are non-renewable, where possible. The CEMP will be secured via a suitably worded planning condition.

3.20. During construction standard mitigation measures (as legal requirements and/or as standard practices) such as pollution control measures and activities which will reduce environmental effects. The CEMP will also include roles and responsibilities, and monitoring requirements. A commitment will be made to periodically review the CEMP and undertake regular

environmental audits of its implementation during the construction phase. These measures will ensure that during the construction phase, the Proposed Development will not result in significant adverse environmental effects on the environment.

3.21. The Site is located within Agricultural Land Classification (ALC) Grade 4 which is considered poor quality agricultural land and is not considered Best and Most Versatile (BMV) land. Therefore, there would be no loss of good quality or BMV agricultural land as a result of the proposals. The battery storage infrastructure is also reversible and after a period of 40 years the equipment would be removed from the Site and the land returned to agricultural purposes.

3.22. The Site is not subject to any statutory or non-statutory nature conservation designation, as discussed previously there are nature conservations in the surrounding area there are three SSSI including Wetley Moor SSSI (c. 1km south-west), Churnut Valley SSSI (c. 3.7km south-east) and Hulme Quarry SSSI and NNR (c. 4.2km south-west). The PEA[8] submitted in support of the previous application found the Site does not provide supporting habitat for Wetley Moor SSSI and the other designated sites are located some distance away and share no linking habitat. As such no significant effects on designated sites are likely as a result of the proposals.

3.23. In terms of biodiversity of the Site itself, the PEA identified the predominant habitat on Site is poor semi-improved grassland with areas of shrub, the boundaries of the Site are defined by hedgerows and trees which provide linear habitat. The on-site vegetation is considered to be of value within the immediate vicinity, providing wildlife corridors and potential habitat for protected species. The PEA also noted low potential for protected species present on Site with the exception of foraging birds, foraging badgers and hedgehogs. The proposals include the retention of vegetation present within the Site and also include enhancement measures such as landscape planting and also the provision of bat and bird boxes. Therefore, the proposals would not lead to significant effects on biodiversity. Furthermore, the proposals will seek to enhance local wildlife connections and provide a biodiversity net gain on Site.

3.24. The Site is not located within an area at risk of flooding from fluvial sources, there is an area at medium risk of surface water flooding located along the western boundary of the Site. A Flood Risk & Surface Water Drainage Strategy[9] was prepared as part of the previous application which found given the scale and nature of the proposals and the size and location of the surface water flooding sources that the flood risk to the Site is considered low. The FRA also included a surface water drainage strategy which demonstrated surface water could be effectively managed through SuDS features which would be accommodated within the design of the proposals and this would not lead to any risk of flooding for the area surrounding the Site. As such no significant effects are likely on surface water or flooding as a result of the proposals. A Flood Risk and Drainage Strategy will be submitted in support of the planning application which will confirm the proposed SuDS features.

[8] Phlorum, 2021, Preliminary Ecological Appraisal: Newfields Farm, Wetley Rocks
[9] KRS Environmental, 2022, Flood Risk & Surface Water Drainage Assessment

3.25. As such, there are no significant effects on the land as a resource as result of the Proposed Development which will require an EIA to assess them. The Proposed Development is unlikely to result in significant effects for the purposes of EIA.

d) the production of waste

3.26. As with nearly all development projects, the Proposed Development will result in waste materials from site preparation and undertaking of works during the construction phase. However, given the nature of the Proposed Development this is considered to be minimal and can be managed through standard best practice measures. Construction waste would be reused and recycled where possible. However, significant quantities of construction waste are not anticipated as a result of the Proposed Development as many of the structures proposed would be decommissioned and would be removed after a period of 40 years or when the battery storage facility is no longer required. Construction waste would be managed in accordance with all applicable legislation and disposed of in line with best practice.

3.27. Operational waste produced would be minimal as the BESS would be unmanned, other than for maintenance purposes. Any operational waste produced would be disposed of in line with Council requirements and managed in accordance with all applicable legislation. An EIA would not be required on the basis of the production of waste either during the construction or operational phases of development.

e) pollution and nuisances

Release of emissions to air & nuisance

3.28. During the construction phase of the Proposed Development, dust could be generated from activities associated with the construction of the battery storage facilities. Although anticipated to be minimal, dust generation would be managed in accordance with standard best practice measures, enforced through a CEMP. It is not anticipated to generate significant adverse effects. There would be emissions associated with plant and vehicles during the construction phase. Arrival and departure of any Heavy Good Vehicles (HGV) will be dispersed across the working day to avoid a concentration of released pollutants associated with the plant and vehicles required for the construction phase. In addition, the construction phase will be temporary.

3.29. During the operational phase of development, given that scale and nature of the development proposed, emissions generated from the development once operational will not be significant nor of a scale to require an EIA. The Site is not located within close proximity to AQMA, the closest AQMA to the Site is the Stoke-on-Trent AQMA located c.2.7km west. Due to the distance between significant effects are considered unlikely.

3.30. The potential exists for noise effects to result from the construction processes and operational activities associated with the Proposed Development on nearby sensitive receptors. Construction effects will be managed in accordance with best practice measures, implemented through the CEMP and are not anticipated to generate significant adverse effects.

3.31. As part of the previous application a Noise Impact Assessment[10] was prepared which considered an operational relative plant noise limit of 5 dB above the existing background noise level and used typical equipment to provide noise calculations of the facility operating at full capacity. This found that for most of the time the facility would be operating below the limited noise limit of 5dB above the existing background level.

3.32. It is relevant to acknowledge the previous application received an objection from the Environmental Health Officer (EHO) in relation to operational noise levels. The EHO recommend "*a limit of +5 noise rating over pre-existing daytime background sound levels and no exceedance over pre-existing night time background noise levels*". The EHO note:

"*In the case of this application there is a predicted exceedance for the night at the properties AP1 (Greenfields Farm) and AP2 (Rownall Road Properties) so our standard condition would not be met, the exceedance is +5db and +4db respectively.*"

3.33. In light of the EHO comments the proposals have been reviewed and amended to reduce the noise effects of the proposals, specifically the night-time levels. Once operational it is acknowledged the Proposed Development would lead to an increase in noise, from the battery storage infrastructure, however the location is already subject to elevated levels of noise from the existing Cellarhead Substation located adjacent to the north-eastern boundary of the Site. In addition, it is proposed that acoustic fencing be used along the eastern, western and southern boundaries of the Site to reduce the noise effects for nearby receptors. Therefore, with mitigation, noise produced by the operation of the proposals is not considered significant in EIA terms. An updated Noise Assessment will be submitted in support of the planning application to confirm the proposed specification for acoustic attenuation.

3.34. An EIA would not be required on the basis of the potential release of emissions to the environment or from nuisance related activities.

Release of contaminants to the environment

3.35. Given the nature of the Site and its historical uses, no significant contamination effects are considered likely from existing contamination sources. In addition, appropriate measures, in accordance with all relevant legislation, and implemented through the CEMP, would be used to prevent accidental spillages of contaminants during the construction of the Proposed Development, including site clearance. The proposed operational land use will not result in significant risks of contaminants being released into the environment.

f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

3.36. During the construction phase, the appointed contractor(s) will implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. All such measures will form part of the CEMP. In addition, the Proposed Development will not involve hazardous substances nor does the Site lie within an area at risk of natural disasters.

[10] ION Acoustics, 2022, Noise Assessment for Planning Acoustics Report A1851 R01A.

3.37. There will be no harmful materials or substances used during either the construction or operational phases. The operational development is not expected to involve the use, transport or production of substances or materials which could be harmful to the environment. There is a potential fire risk associated with certain types of batteries such as lithium ion, however cooling systems integrated into the containers housing the batteries are designed to regulate temperatures to safe conditions that minimise the risk of fire. Any system installed is strenuously tested during the factory and pre-commissioning testing regimes before the final energisation sign-off. Through careful design, protection, monitoring and suppression and containment measures, the risk of fire is small and unlikely. Furthermore, an Outline Battery Safety Management Plan[11], was produced for the previous application which outlined measures to be put in place to reduce the risk of fire such as fire detection and suppression measures and also the use of a Safety Log. This document will support of the planning application.

3.38. Considering the nature and location of the Proposed Development, it is not considered to be vulnerable to, or give rise to significant impacts in relation to the Risk of Accidents and Major Disasters.

g) the risks to human health (for example, due to water contamination or air pollution)

3.39. The Site is not located within an area identified as at risk from fluvial flooding, the majority of the Site is of very low risk of surface water flooding with the western boundary of medium risk. As discussed previously in this report a Flood Risk and Drainage Strategy[12] was submitted as part of the previous proposal which demonstrated the risk of surface water flooding to the Site is considered low. This report also confirmed that with the inclusion of SuDS features the proposals would not increase flood risk within the Site or within the area surrounding the Site.

3.40. As above, dust and emissions generated during the construction phase would be minimised in accordance with standard best practice measures, enforced through the CEMP, and are not anticipated to generate adverse effects to human health. In addition, the CEMP will set out guidelines to ensure that construction contractors use best practice measures to prevent land and water contamination, as well as effects on construction workers. The land use proposed is not highly contaminative and it is not expected that there is a high risk of contaminants being released into the environment.

3.41. During operation there would be no unusual risk to human health. The development relies on well-established, safe modern technology and correct Health and Safety signage will be displayed on the Site to inform of the potential risk from working near electrical equipment and to discourage trespass. As discussed in the previous section there is a potential fire risk, however through careful design, protection, monitoring and suppression and containment measures, the risk of fire is small and unlikely. An EIA is not required on the basis of likely significant effects to human health.

[11] Enzygo, 2022, Outline Battery Safety Management Plan
[12] KRS Environmental, 2022, Flood Risk & Surface Water Drainage Assessment

Location of Development

a) the existing and approved land use

3.42. The proposals will result in the development of agricultural land, which is currently used for grazing animals, this will alter the land use of the area, albeit until such time as the facility is decommissioned. Landscape planting will be embedded in the design of the proposals and will provide screening into the Site and will also provide biodiversity enhancement measures such as enhancing existing wildlife corridors. Furthermore, the proposals are reversible and will be decommissioned after a period of 40 years and the land returned to agricultural use.

b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

3.43. There are no high quality or scare resources that could be significantly affected within the Site. Furthermore, the proposals are seeking to enhance the biodiversity of the Site through landscape planting and enhancing wildlife corridors.

c) the absorption capacity of the natural environment

3.44. The EIA regulations state that particular attention should be paid to wetlands; coastal zones; mountain and forest areas; nature reserves or parks; areas designated under European Union (EU) Directives on the conservation of wild birds, natural habitats, flora and fauna; areas in which environmental standards have been exceeded; densely populated areas; or landscapes of historical, cultural or archaeological significance.

3.45. As discussed previously in this report there are no designated sites for nature conservation within the Site itself, and the Site shares no connecting habitat with designated sites in the surrounding area and is separated from them by some distance. The vegetation present within the Site is considered to be of value for areas within the immediate vicinity and provides wildlife corridors which could support protected species. The existing vegetation within the Site will be retained where possible and landscape planting will seek to enhance existing habitat and wildlife corridors. Therefore, no significant effects on biodiversity or designated sites for nature conservation are anticipated as a result of the proposals.

3.46. A Landscape and Visual Impact Assessment (LVIA)[13] was produced as part of the previous application, this concluded minor to neutral effects on landscape character. Noting the proposals would present a change in the land use, however this would be considered localised due to the small size of the Site and its location next to the existing Cellarhead Substation and would not lead to effects on the wider landscape. In terms of the visual effects the Site is visually contained by Cellarhead Substation to the north-east and associated woodland from the east and south-east. Existing vegetation along the boundaries of the Site and also present within the surrounding landscape provides a level of screening to the Site and limits long distance views into the Site. Visual effects would be localised and limited to the users of the PRoW located along the southern and eastern boundaries of the Site, the PRoW network in the area surrounding the Site, and also to nearby individual residential properties. With the incorporation of appropriate landscape planting around the boundaries

[13] UBU Design, 2022, Landscape and Visual Impact Assessment.

of the Site the proposals would not result in any significant effects on landscape and visual. A Landscape and Visual Impact Assessment will support the planning application which will confirm the proposed landscape planting strategy.

3.47. In terms of heritage assets, there are no designated assets located within the Site itself. Within the area surrounding the Site there is a Scheduled Monument, moated site and pond at Moor Hall Farm (c. 1.7km north), and the Grade II Listed stables to Rownall Hall (c. 800m north-east), however it is notes that Rownall Hall has now been demolished. Due to the distance between the Site and these heritage features and the undulating topography of the surrounding landscape no significant effects on heritage assets are likely. A Heritage Statement has been prepared which will support the planning application this concluded the Site has low potential for archaeological remains and no effect on the setting for designated heritage assets within the area surrounding the Site.

3.48. Accordingly, it is considered the Site has the absorption capacity for the Proposed Development without resulting in any significant effects on the environment. The Site and its surrounds are considered to be resilient to change.

Characteristics of Potential Impact

a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)

3.49. Physical changes to the Site during construction stage will be limited to the Site itself and are short term. Potential off-site operational effects relate to the change in landscape character and visual changes experienced by identified receptors. Adverse visual effects as a result of the Proposed Development would occur primarily at the local scale and with the implementation of landscape planting significant effects are considered unlikely. The Site is also not contained on land designated for its high landscape or scenic value. An EIA is therefore not required on this basis.

b) the nature of the impact

3.50. The nature of potential impacts associated with the Proposed Development has been discussed earlier in this report, but these are not considered to be significant to trigger the requirement for EIA. The analysis presented previously in this report demonstrates that environmental effects are unlikely to be significant both in terms of the intensity of an effect or its complexity.

c) the transboundary nature of the impact

3.51. Transboundary impacts are not applicable for a development of this nature and scale in this location.

d) the intensity and complexity of the impact

3.52. The analysis presented previously in this report demonstrates that environmental effects are unlikely to be significant both in terms of the intensity of an effect or its complexity. Effects will not extend to a significant spatial scale and are not complex.

e) the probability of the impact

3.53. The effects of the Proposed Development can be clearly established, and the probability of any effects determined with reasonable confidence. As such and based on the screening appraisal undertaken and taking into account the characteristics of the Proposed Development, significant adverse effects are unlikely as a result of the proposals and impacts would be of limited geographical extent. There would also be extremely low probabilities of any large significant effects occurring over a wide area. No conceivable events would be of a magnitude or scale that would result in likely significant environmental effects.

f) the expected onset, duration, frequency and reversibility of the impact

3.54. The development is expected to commence following the discharge of any pre-commencement conditions and given the scale of the development proposed, the construction period is expected to last for approximately 6 to 9 months. Any associated effects linked to construction will be short term or temporary in nature. Once the development is complete there will be no long term significant adverse effects associated with the Proposed Development. Furthermore, the proposals are considered reversible and will be decommissioned after a period of 40 years or until the battery storage facility is no longer required and the land would be returned back to agricultural uses.

g) the cumulation of the impact with the impact of other existing and/or approved development

3.55. The likelihood of cumulative effects has been discussed earlier in this screening analysis which confirm that there are no significant cumulative effects associated with the Proposed Development.

h) the possibility of effectively reducing the impact

3.56. As discussed throughout this screening well understood, standard mitigation measures are proposed to effectively reduce any impact. To confirm these measures are:

- Construction Environmental Management Plan (CEMP).
- Flood Risk and Drainage Strategy.
- Acoustic attenuation.
- Battery Safety Management Plan.
- Design embedded mitigation which includes: the retention of established vegetation along the boundaries of the Site; no development proposed within the root protection areas of high-quality trees; retention of the two PROWs within the Site on the current routing and enhancement through management and removal of overgrown vegetation; and landscape planting and biodiversity enhancement measures including bat and bird boxes and retaining existing wildlife corridors. A high degree of confidence can be placed in the mitigation measures proposed. It is envisaged that these measures could be secured to a planning permission through suitably worded planning conditions.

4. Conclusions

4.1. In the context of the above discussions, it is our view that the Proposed Development is **not** likely to have significant effects on the environment by virtue of factors such as its nature, size or location and consequently **does not require an EIA**. The Proposed Development is not Schedule 1 development for which EIA is mandatory. The Proposed Development falls within Schedule 2, 3 (a) of the EIA Regulations as an energy project and meets the threshold criteria as the Site area is larger than 0.5ha, therefore the Proposed Development constitutes a Schedule 2 development.

4.2. In summary, the Site is not located within a sensitive area as defined by the EIA Regulations and as demonstrated, the environmental effects associated with the development are unlikely to be significant and well understood, standard mitigation measures can be adopted. As such, the development is not considered to constitute EIA development as defined by the EIA Regulations.

4.3. As with all development however, it is acknowledged that there is the potential for less than significant impacts or changes to affect the environment. The project team have sought and will continue to seek to minimise these through careful design and the masterplanning process.

4.4. Supporting statements are likely to include:

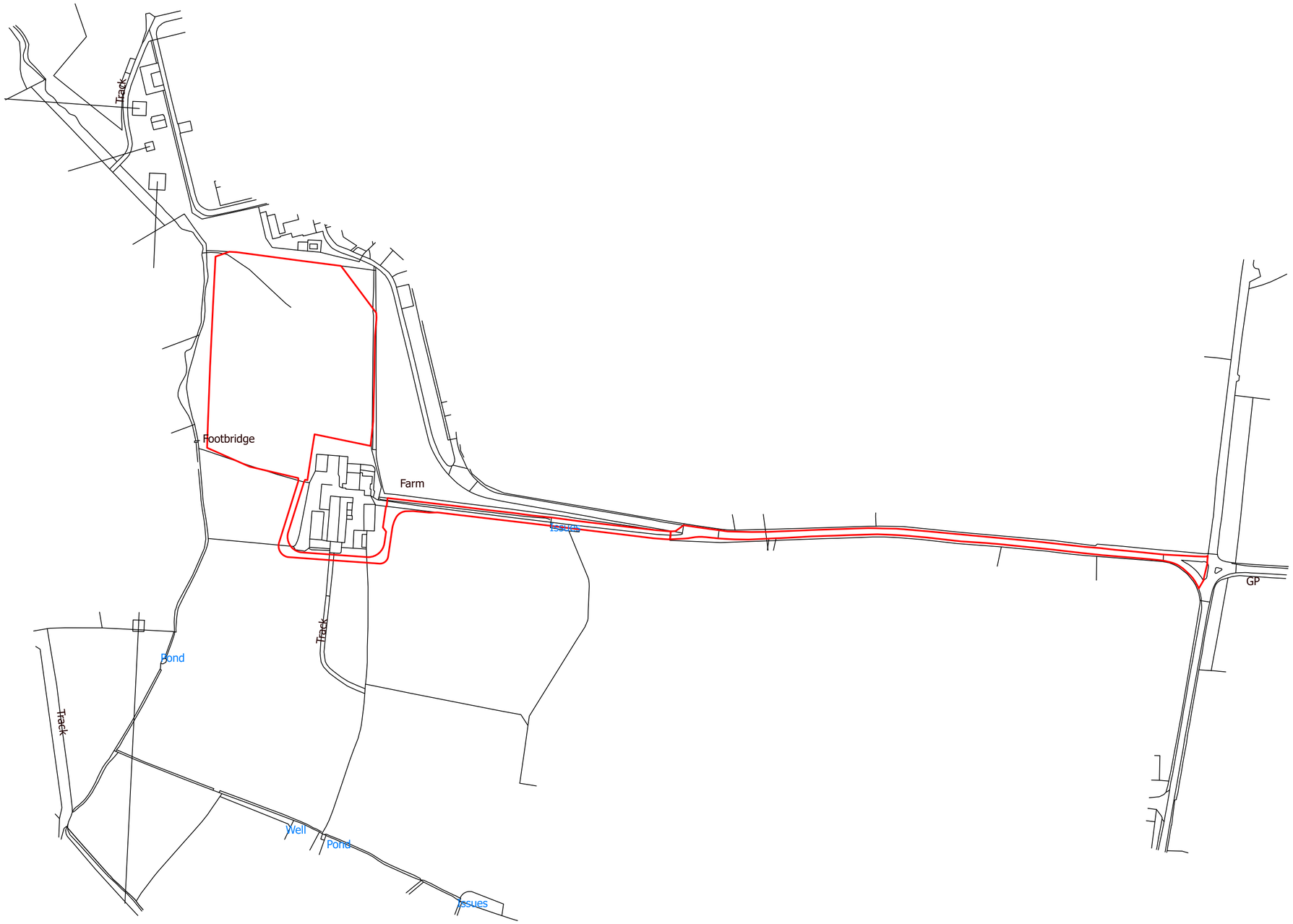
- Preliminary Ecology Report;
- Biodiversity Net Gain Report;
- Arboriculture Report;
- Noise Assessment;
- Flood Risk and Drainage Strategy;
- Transport Statement;
- Landscape and Visual Assessment;
- Outline Battery Safety Management Plan;
- Heritage Statement;
- Planning Statement; and
- Design and Access Statement.

4.5. We believe these supporting documents will provide Staffordshire Moorlands District Council with all the necessary information concerning the effects of the Proposed Development, without the need for an EIA, so to enable them to make an informed decision concerning the proposals.

4.6. In order to confirm this, a formal Screening Opinion on the requirement for EIA is requested from Staffordshire Moorlands District Council in accordance with Regulation 6 of the EIA Regulations. We look forward to their response within the timescales stipulated in the above Regulation.

CONCLUSION: EIA IS NOT REQUIRED

Appendix 1: Site Location Plan



KEY

Site Boundary

NOTES:
REVISIONS:

SITE LOCATION PLAN

NEWFIELDS FARM

CLIENT
Newfields BESS Ltd.

0 0.1 km

DATE	SCALE	TEAM	APPROVED
28/06/2023	1:2,500@A2	CS	EB

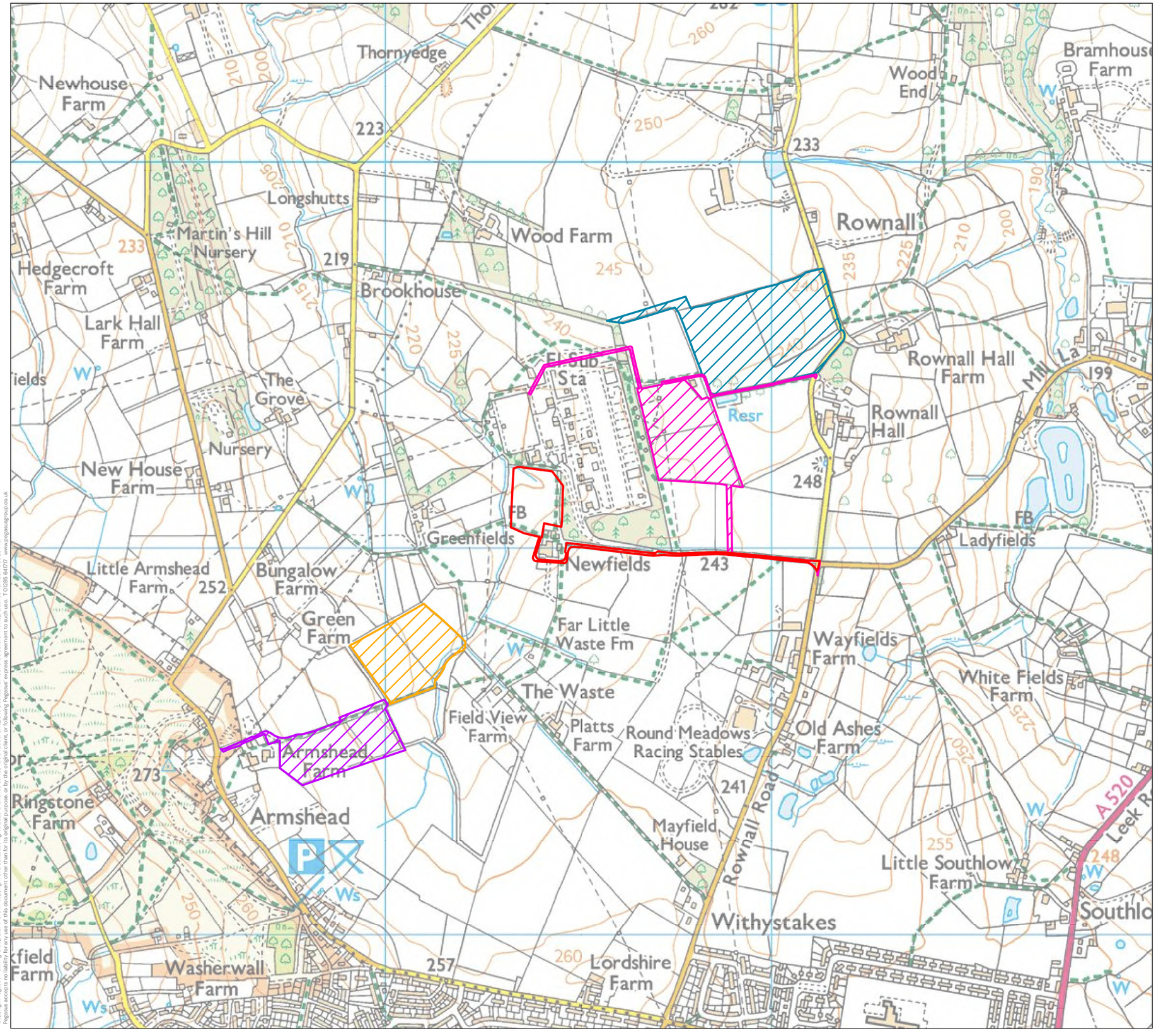
SHEET	REVISION
-	-

DRAWING NUMBER
P23-0415_EN_02

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Appendix 2: Cumulative Battery Storage Schemes



KEY

SMD/2022/0444 - Erection of a flexible energy facility on land east of Cellarhead Substation and west of Rownall Road. Application granted 22/12/2022.

SMD/2022/0548 - Erection and operation of a Battery Energy Storage System and associated infrastructure and equipment with a capacity of up to 280 MVA. Located on land adjacent to Cellarhead Substation, Rownall Road. Awaiting decision.

SMD/2022/0574 - Erection of storage containers, support infrastructure and security fencing for battery energy storage facility along with landscaping and all associated works. Located on land adjacent to Armshead Farm, Armshead Road. Awaiting decision.

SMD/2021/0496 - Screening request for a solar farm of approximately 1.5MW with energy storage capacity of up to 57MW on 4.25 hectares of land at Greenfields Farm. Determined non-EIA development.

Site Boundary

NOTES:
REVISIONS:
A - (28/06/2023 AJH) revised boundary

CUMULATIVE BATTERY STORAGE SCHEMES

NEWFIELDS FARM

CLIENT
Newfields BESS Ltd.

0 0.4 km

DATE	SCALE	TEAM	APPROVED
28/06/2023	1:10,000@A3	NC	EB

SHEET	REVISION
-	A

DRAWING NUMBER
P23-0415_EN_01

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