**From:** Steve Massey
**Sent:** 19 July 2023 13:55
**To:** John Copestake
**Cc:** Planning Comments (SMDC)
**Subject:** SMD/2023/0318 - Land at Newfields Farm, Rownall Road ST9 0BS - Screening Opinion request

**Categories:**

John,

**Summary: EIA not required in relation to landscape and visual impact issues, but nevertheless these issues must be demonstrably taken into account in designing the proposed scheme, with the subsequent planning application being supported by comprehensive tree and landscape impact assessments, landscape strategy and landscaping scheme.**

In relation to The Town and Country Planning (Environmental Impact Assessment) Regulations 2017:

Based on the information about the proposed Battery Energy Storage System (BESS) development provided by the applicant in their Screening Opinion request and accompanying EIA Screening Report, and *with reference only to the subject areas on which I am responsible for considering and commenting i.e. landscape and visual impact including that on trees/hedges/woodlands etc*, I have the following comments:

The proposed development is not a Schedule 1 development.

The proposal site is not within nor partly within a Sensitive Area. At closest, the site is a little over 900m from Wetley Moor SSSI to the south-west, but this is not considered so close as to be likely to cause significant environmental effects on the SSSI to the extent that an EIA Screening Opinion should is required for this reason.

The proposal is Schedule 2 development. It falls within Column 1 under 3(a) Energy Industry: Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1). The proposal site exceeds the 0.5ha threshold in Column 2 of Schedule 2, being c.2.5ha including proposed access track from Rownall Road, and therefore a Screening Opinion is required.

It is therefore necessary to take account of the Schedule 3 Selection Criteria, and to have regard to the Indicative Thresholds referred to in Paragraphs 018 and 057 of the Planning Policy Guidance and set out in tabular form at Paragraph 058.

Column 3 of the Indicative Thresholds table suggests a thermal output threshold of greater than 50MW. Whilst the applicant's submitted details state an electricity storage capacity of up to 99.9MW, it is noted that the scheme is for electricity storage in batteries rather than generation on site, and therefore this Indicative Threshold is in itself of no real relevance here. Nevertheless Column 4 of the Indicative Thresholds table advises that in this context key issues would include visual impact. The development would be likely to comprise battery ranks, transformers and switchgear, various small buildings, vehicle access roads/tracks and parking, perimeter fencing and landscaping etc typical of such a scheme. These would clearly have a notable direct impact on the landscape character of the site itself and a visual impact on the site and surrounding area. However, it is considered that the typical scale of such development, as mitigated by a landscape strategy, would lead to visual impact of insufficient significance to require a full EIA – particularly in the context of the site being immediately adjacent to the existing and visually dominant Cellarhead Sub-Station and radiating large pylons and transmission lines.

There are a number of similar BESS proposals at various stages of the planning process in the nearby area, and also a solar panel farm proposal. Only one of these currently has the firm position of planning permission having been granted. Nevertheless, it is appropriate also to have regard to the potential cumulative landscape and visual impact effects of these

various proposals together with the currently proposed scheme. Again with reference to the scale and character of these developments, and again taken in the context of the existing landscape character of the local area and the proposed landscape/visual impact mitigation measures expected to form part of such schemes, it is considered that potential cumulative effects would not be of sufficient significance to require full EIA.

**My conclusion is that in relation to landscape and visual issues, the currently proposed BESS scheme would not require full EIA. This is consistent with our approach and Screening Opinions in relation to recent/current similar schemes in the area.**

Nevertheless, landscape and visual impact effects would clearly be a key issue to be considered in relation to a planning application for the proposed scheme. We should expect and require that such an application should be accompanied by:

- A comprehensive Tree Survey and Arboricultural Impact Assessment Report, in accordance with British Standard 5837:2012 *Trees in Relation to Design, Demolition and Construction – Recommendations.*
- A comprehensive Landscape and Visual Impact Appraisal. This should consider the proposal in the context of existing published Landscape Character Assessments – in particular the Landscape and Settlement Character Assessment of the Staffordshire Moorlands (2008). Cumulative effects of other proposals in combination with the currently proposed scheme should also be addressed.
- A comprehensive Landscape Strategy and detailed Landscaping Proposals Scheme. This should consider not only landscape mitigation within the site itself, but also – where possible – any landscape mitigation, restoration or enhancement measures for the surrounding area which may be relevant.

**Steve Massey**

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