

Planning, Design, and Access Statement

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

**Newfields Farm, Rownall Road, Wetley Rocks, Staffordshire,
ST9 OBS**

On behalf of Newfields BESS Ltd.

Date: January 2024 | Pegasus Ref: P23-0415

Author: ARG/DP



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	December 2023	ARG	DP	-
2	January 2024	ARG	DP	Client comments



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APPENDIX 1: MAP SHOWING CUMULATIVE BATTERY STORAGE SCHEMES

1. INTRODUCTION

1.1. This Planning Statement has been prepared on behalf of Newfields BESS Ltd (hereafter referred to as the "**Applicant**") and supports an application for full planning permission on land at Newfields Farm, Rownall Road, Wetley Rocks, Staffordshire, ST9 OBS (hereafter referred to as the "**Site**").

1.2. The Applicant is seeking full planning permission for the development of a Battery Energy Storage System ("BESS") facility with a storage capacity of up to 99.9MW. The full description of development reads as follows:

"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."

1.3. An application for a BESS facility on the Site was submitted by the Applicant in spring 2022. It was validated on 21st April 2022 and given the reference SMD/2022/0180. It was later withdrawn in December 2022. This proposal forms as a new planning application and is an amended version of the previous scheme, with the revisions addressing the comments which were raised by officers at Staffordshire Moorlands District Council, statutory consultees, Cheddleton Parish Council, and members of the public. Section 4 sets out the proposed scheme and its amendments when compared to the previous application.

Background

1.4. The National Grid operates a 'Balancing Service' required to balance demand and supply and ensure the security and quality of the electricity supply across its transmission system. System frequency is a continuously changing variable that is determined and controlled by the second-by-second (real time) balance between system demand and total generation. If demand is greater than generation, the frequency falls while if generation is greater than demand, the frequency rises.

1.5. The National Grid has a licence obligation to control frequency within the limits specified in the 'Electricity Supply Regulations', i.e. $\pm 1\%$ of nominal system frequency (50.00Hz) save in abnormal or exceptional circumstances. National Grid must therefore ensure that sufficient

generation and/or demand is held in automatic readiness to manage all credible circumstances that might result in frequency variations.

- 1.6. The proposed energy storage scheme at the Site will assist towards controlling the frequency by either charging or discharging its stored energy as and when required. Development of the battery project therefore provides a valuable national service.
- 1.7. Importantly, battery energy storage schemes also allow more renewable energy production to be integrated into the system. The variable supply that is inherent in renewables creates peaks and troughs in electricity production. Battery energy storage facilities such as the one proposed in this application allows for any peaks and troughs in electricity supply, being able to respond at short notice to requests from National Grid to generate electricity, when renewable sources are not generating.
- 1.8. The application proposal would enable the storage of zero carbon energy as well as providing balancing services to the National Grid. Its grid balancing mechanism specifically forms part of the renewable energy infrastructure being developed to meet the UK's obligations under the Climate Change Act 2008 (as amended).
- 1.9. The proposal would provide greater capacity and flexibility in the energy generation network and would support the move towards a low carbon energy network supplied increasingly by renewable energy developments. The proposal constitutes development required to make full use of renewable energy and will make an important contribution to ensure that Staffordshire Moorlands District Council can meet their own planning objectives by minimising greenhouse gas emissions and supporting the use of renewable energy.

Statutory Considerations

- 1.10. The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 set out in Schedule 1 those developments for which an Environmental Impact Assessment (EIA) is mandatory and, in Schedule 2, those where an EIA may be required. The application proposal does not fall within Schedule 1 developments.
- 1.11. A request for a Screening Opinion was submitted on behalf of the Applicant (ref. SMD/2023/0318) on 29th June 2023 in order to ascertain whether the development requires an Environmental Impact Assessment (EIA). The case officer of this application has informally

stated that the proposal comprises a non-EIA development however a formal response has yet to be issued by the Council.

1.12. For clarity, there is no express threshold for battery energy storage developments to be considered as Schedule 2 development under the EIA Regulations. However, a development area threshold of 0.5 ha is applied to category 3 (a) industrial installations for the production of electricity. The Development exceeds the Schedule 2 area threshold of 0.5 hectares and, as such, whether the Development is EIA development or not depends on an assessment against the screening selection criteria, as set out in Schedule 3 of the EIA Regulations, which comprise:

- Characteristics of the development;
- Location of the development; and
- Characteristics of the potential impact.

1.13. PPG Paragraph 018 states that EIA will only apply to a small proportion of projects and only those which are likely to have significant effects. The key question is whether or not the project would be likely to give rise to significant effects on the receiving environment, taking into account the selection criteria in Schedule 3.

1.14. Whilst applications for battery energy storage developments have only been forthcoming recently, given their simplistic nature, small footprints, low vertical extents and limited noise effects they have not generally triggered EIA. The anticipated effects arising from this application, as detailed in this Planning Statement and supporting reports such as the Landscape and Visual Impact Assessment, are not considered sufficient to trigger the requirement for an EIA, and hence the planning application is not accompanied by an Environmental Statement.

Submission

1.15. The material submitted in support of this application is as follows:

Reports

- Planning, Design, and Access Statement (this document)

- Consultation Statement
- Landscape and Visual Impact Assessment
- Arboricultural Impact Assessment
- Built Heritage and Archaeological Assessment
- Ecology Walkover & Assessment Note
- Biodiversity Net Gain Metric
- Preliminary Ecological Appraisal
- Flood Risk & Surface Water Drainage Assessment
- Outline Battery Safety Management Plan
- Ground Conditions (Phase 1 and Phase 2)
- Noise Impact Assessment
- Transport and Access Statement

Drawings

- Location Plan (drawing no. 23-O415_EN_02)
- Overall site layout (drawing no. 88-10-05-PL-LA-OA)
- Plans and Elevations of DNO Control Building (drawing no. 88-10-05-C-PL-EQ-01)
- Plan and Elevations of DNO Storage Container (drawing no. 88-10-05-C-PL-EQ-02)
- Proposed Fence and Gate Details (drawing no. 88-10-05-PL-FG)
- Elevations and Sections of 132kV Metering Substation (drawing no. 88-10-05-PL-SS-ELV-01)
- Elevations and Sections of 132kV Metering Substation (drawing no. 88-10-05-PL-SS-ELV-02)

- Elevations and Sections of 132kV Metering Substation (drawing no. 88-10-05-PL-SS-ELV-03)
- Plan and Elevations of BESS Units and MV SKID Solution (drawing no. 88-10-05-P-PL-EQ-03)
- Plan and Elevations of Storage Container and Auxiliary Transformer (drawing no. 88-10-05-P-PL-EQ-04)
- Plan and Elevations of Customer Switchgear Building (drawing no. 88-10-05-P-PL-EQ-05)
- Plan and Elevations of Customer Control Building (drawing no. 88-10-05-P-PL-EQ-06)
- Plan and Elevations of CCTV Camera Column (drawing no. 88-10-05-P-PL-EQ-07)
- Strategic Landscape Planting Plan (drawing no. P23-0415_EN_0007_-_0001)
- Illustrative Landscape Cross Sections (drawing no. P23-0415_EN_0008_-_0001)
- Topographical survey (drawing no. PLS-NP-FT-TS-00)
- Acoustic Bund Detail (drawing no. E14509-WRD-XX-XX-DR-C-1001)
- Cut and Fill Plan (drawing no. E14509-WRD-XX-XX-DR-C-1102)

- 1.16. This Planning Statement proceeds to set out the context of the Site and outlines the planning history for both the Application Site and other relevant sites in the vicinity. It will then outline the evolution to the scheme, prior to describing the proposed development in detail. The Statement will then review the relevant planning policies (both local and national) and material considerations. The proposals are subsequently assessed and tested against these, bringing together the additional supporting information accompanying the planning application.
- 1.17. It will be shown that the proposals are in overall accordance with national and local planning policy and will enable the achievement of sustainable development. Accordingly, it is respectfully requested that planning permission be granted.

2. SITE CONTEXT

- 2.1. The Site, the subject of this application, including land to be used for access, comprises 2.48 hectares, located within the administrative boundary of Staffordshire Moorlands District Council. It is situated within Cheddleton Parish, around 1.2 kilometres to the north of the village of Werrington and approximately 11 kilometres east of the urban area of Stoke on Trent. The main part of the Site comprises agricultural land used for sheep grazing. The entire Site and surrounding area are located within the designated Green Belt.
- 2.2. The Site is bounded by a spinney to the east and north, immediately beyond which is the National Grid Cellarhead Substation, which consists of steel-lattice pylons and associated electricity infrastructure. The Site adjoins agricultural fields to the west, with a drainage ditch and established trees and vegetation adjoining the western boundary. Agricultural buildings and a farmhouse are situated to the south, comprising Newfields Farm, with agricultural fields beyond. An existing access track runs eastwards from the main part of the Site, initially through the Newfields Farm complex of buildings, joining Rownall Road where it intersects with Mill Lane. This existing access track will be used for the development proposed. An area of woodland adjoining with the aforementioned spinney is located between the Cellarhead Substation and the existing Newfields Farm access track in its approach from the east.
- 2.3. The only statutory designated ecological site within 2km of the Site is Wetley More Site of Special Scientific Interest (SSSI) which is located 700m to the west. The closest non-statutory designated site is The Rookery, Rownall Local Wildlife Site (LWS) which is located 1.5km to the north-east. Further details of the ecological and arboricultural context of the Site and surrounding area is outlined in the accompanying Ecology Walkover & Assessment Note, the associated previous Preliminary Ecological Assessment and the Arboricultural Impact Assessment.
- 2.4. The main part of the Site is a single parcel of pastoral farmland. According to Natural England, this is classified as Grade 4 (Poor), and therefore does not fall within the definition of 'best and most versatile agricultural land' set out in the National Planning Policy Framework (NPPF). The aforementioned access track is tarmacked and provides existing access to Newfields Farm where it forks left – the right fork does not fall within the Site boundary and provides access to the Cellarhead Substation. The topography of the Site rises gradually from 225 metres Above Ordnance Datum (AOD) in the north-west of the Site to 230 metres AOD in

the south-east. The Site is at a low risk of flooding, falling within Flood Zone 1. Further details of the flood risk & drainage context of the Site and surrounding area is outlined in the accompanying Flood Risk & Surface Water Drainage Assessment.

- 2.5. Within 1km of the Site, there are no scheduled monuments, registered parks and gardens or conservation areas. There are two Grade II listed buildings within this area; Stables to Rownall Hall (NHLE 1188808) and Milestone at SJ 943 475 (NHLE 1374659). Further details of the heritage context of the Site and surrounding area is outlined in the accompanying Built Heritage & Archaeological Assessment.
- 2.6. Footpath Cheddleton 60 runs east-west along the southern edge of the field which contains the Site, whilst Cheddleton 48 follows the eastern boundary of the field, running between the Site and Cellarhead Substation. There are several other public rights of way within the vicinity of the Site which extend across the wider landscape, including Cheddleton 49, 47, 53, 58, and 59.

3. PLANNING HISTORY

- 3.1. This application follows a previous planning application for a BESS development on the Site. This was validated by Staffordshire Moorlands District Council on 21st April 2022 and given the reference SMD/2022/O180.
- 3.2. Following the submission of the application and (in some instances) after additional information was provided following requests; there were no objections from SCC Public Rights of Way, The Ramblers Association, Peak and Northern Footpath Society, the Environment Agency, Staffordshire County Council Highways, the Lead Local Flood Authority, Staffordshire Wildlife Trust, and Severn Trent Water.
- 3.3. However, Environmental Health raised objections on the basis of concerns around the night-time background noise levels and the cumulative impact of other BESS schemes and the adjacent substation; with the Applicant encouraged to investigate further mitigation measures. Cheddleton Parish Council also objected to the development, citing safety concerns and the proposal's impact on the Green Belt. The Applicant chose to withdraw the planning application on 6th December 2022.
- 3.4. There is no other relevant planning history for the Site.

Nearby BESS Proposals

- 3.5. A search of the Staffordshire Moorlands District Council's planning application public register has been undertaken to identify other recently submitted BESS schemes in the vicinity of the Site. The following sites have been identified. Please also see **Appendix 1 – Map showing Cumulative Battery Storage Schemes** of this Statement, which visually shows the location of these sites.
- **Application Ref. SMD/2022/O444:** Erection of a flexible energy facility (Land East of Cellarhead Substation, and West of Rownall Road, Wetley Rocks, Staffordshire) – **Approved 22nd December 2022.**
 - **Application Ref. SMD/2022/O548:** Erection and operation of a Battery Energy Storage System and associated infrastructure and equipment (Land Adjacent

Cellarhead Substation, Rownall Road, Wetley Rocks, Staffordshire). **Approved on 27th June 2023.**

- **Application Ref. SMD/2022/0574:** Erection of storage containers, support infrastructure and security fencing for battery energy storage facility along with landscaping and all associated works (Land Adjacent to Armshead Farm, Armshead Road, Werrington, Staffordshire). **Refused 25th June 2023.** Due to this refusal, the application is not shown on the map in Appendix 1.
- **Screening Ref. 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. A planning application for this site is yet to be submitted.

4. DESIGN EVOLUTION & CONSULTATION

Revisions to the Scheme

- 4.1. The previous proposal, the subject of application ref. SMD/2022/0180, comprised 80 battery storage containers, with a built area of approximately 5,000 square metres, excluding the access track and areas of landscaping. 20 MV transformers, 120 power conversion system units, a DNO substation, and a customer control/switchgear building were proposed.
- 4.2. In response to the comments received, the design of the proposal has been amended for this new planning application in order to address the concerns raised, including from the Council's Environmental Health team and Cheddleton Parish Council. Crucially, the scale and area covered by the proposed scheme has been reduced by 54% to 2,300 square metres excluding the access track and areas of landscaping. This has been made possible through the loss of the western half of the facility and the use of different, more compact equipment – battery containers have been replaced by just 14 battery storage racks. Furthermore, the switchyard has been moved from the west, to the east, of the Site, and the access track through and around the Site has been reconfigured accordingly. The varied equipment has also been chosen for its lower noise generation. As a result of these changes, the smaller scheme will result in lower noise levels and a reduction in the visual impact of the development.
- 4.3. The associated redesigned landscape strategy, discussed in more detail in the next section, will ensure that the scheme is well-screened, integrated with surrounding landscape features, and will encourage biodiversity net gains. The new landscape strategy incorporates the use of a bund to deliver acoustic mitigation whilst also providing instant landscape screening mitigation in an appropriate way.

Public Consultation

- 4.4. Public consultation was undertaken between July and August 2023, prior to the submission of the planning application. A website was launched (<https://newfieldsbess.co.uk/>), containing information about the development, the benefits it will deliver, and an online form and email address through which public feedback could be submitted.

- 4.5. The Applicant contacted Cheddleton Parish Council, Support Staffordshire, and Moorland Climate Action via email, and a leaflet was posted to local residents. This informed them of the proposals and invited feedback to influence the final design. Responses were taken on board by the Applicant when finalising the scheme and fixing the layout. More detail is provided in the Consultation Statement which has been submitted as part of this planning application.

5. THE PROPOSED DEVELOPMENT

5.1. This application seeks full planning permission 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."

5.2. This section of the Planning Statement describes the key features of the proposed development and should be read in conjunction with the plans and drawings submitted as part of this application.

BESS Equipment

5.3. The proposed BESS facility comprises the following buildings and equipment:

- 14x battery energy storage cabinets
- 14x skid solutions (inverters and transformers), placed adjacent to each battery energy storage rack
- 1x 132/33 kV switchyard
- 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

5.4. Most of this equipment (with the exception of the DNO control and store buildings) will be contained within one compound area bordered with security fencing. To north and west, this fencing comprises 2.4 metre high palisade security fencing, whilst a 4 metre acoustic barrier

fence is located to the southern and eastern boundaries of the compound area. A 3-metre-high landscaped earth bund with a 2 metre acoustic fence is located on the western side of the BESS facility which gradually integrates with existing levels to the west and in the north-west and south-west corners.

Landscaping Works

- 5.5. In order to ensure that there are minimal landscape and visual impacts resulting from the scheme, a detailed landscaping strategy will be implemented as part of the development. The proposals will be integrated with the existing neighbouring woodland and tree belts surrounding the nearby Cellarhead Substation, which will ensure habitat connectivity and help to minimise the visibility of the proposed development.
- 5.6. The aforementioned bund will have 1 in 3 metre gradient slopes on the inner (eastern) face, seeded with species-rich grass and wildflowers, and a 1 in 5 metre gradient slope on the outer (western) face, where native trees and shrubs will be planted as part of a proposed broadleaved woodland area which extends along the entire western area of the Site and extends to the north and south. The proposed woodland planting helps integrate the Site into the surrounding landscape whilst screening and reducing the visibility of the development. The outer face of the bund is proposed to feature sweeping and undulating slopes to achieve integration with the undulating topography adjoining the Site. The bund has the added benefit of reducing the height of the required acoustic barrier/fence, which can be positioned on top of the bund to achieve the acoustic mitigation required.
- 5.7. The landscaping strategy will have the added benefit of further softening and screening the existing Cellarhead Substation development within views looking towards the Site from the south and west.

Access Track

- 5.8. Access for the proposals will be taken from the existing farm track for Newfields Farm connecting to Rownall Road to the east. This will be slightly updated and widened in places to accommodate construction traffic and a new area of track will be provided to the north-west of the farmstead to connect to the existing track and provide access to the facility. A layby will also be added to assist in the safe entry and exit of construction and emergency vehicles, allowing such vehicles to pass another if needed.



- 5.9. The new track will extend northwards into the BESS facility area, splitting to the south of the BESS facility, continuing in a northerly direction. One track will bisect the facility, providing access to the battery energy storage racks, inverters/transformers, customer switch room, control, and store buildings, and auxiliary transformer. Meanwhile, another track will wrap around the south and east, providing separate access to the switchyard, DNO control building, and DNO store building, with three associated parking spaces provided. The two tracks reconnect to the north of the facility creating a looped access route for construction and emergency vehicle access.

6. PLANNING POLICY

6.1. In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act, applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

6.2. The development proposals take into account a wide range of planning policies at the national and local levels. This section provides an overview of the planning policies and guidance which have been identified to be of relevance. The credentials of the proposals are assessed against the different policy themes and specific policies in Section 7.

DEVELOPMENT PLAN

6.3. The Development Plan for the area consists of the Staffordshire Moorlands Local Plan (adopted September 2020).

Staffordshire Moorlands Local Plan

6.4. **Policy SS 1 (Development Principles)** states that the development and use of land should make a positive contribution towards the social, economic, and environmental improvement of the district. This includes development which contributes effectively to tackling climate change and reducing carbon emissions.

6.5. **Policy SS2 (Settlement Hierarchy)** notes that development in 'Other Rural Areas' and the Green Belt is generally unacceptable and inappropriate (subject to national policy).

6.6. **Policy SS10 (Other Rural Areas Strategy)** emphasizes that rural areas and the Green Belt should only feature development which has an essential need to be in the countryside, supports rural diversification and sustainability, promotes tourism, and enhances the countryside. Priority will be given to protect the character and quality of the area, with all proposals having to respect and sensitively respond to the distinctive qualities of the landscape. Furthermore, renewable energy schemes should be of an appropriate scale, type, and location, and strict control will be exercised over inappropriate development within the Green Belt, although exceptions can be made as per Government policy.

6.7. **Policy SD1 (Sustainable Use of Resources)** makes clear that development should make sustainable use of resources and adapt to climate change. Regard should be given to the

agricultural classification of land, with preference for the use of lower quality over higher quality agricultural land. Development should aim to minimise soil disturbance and retain ecological connectivity.

6.8. **Policy SD2 (Renewable/Low-Carbon Energy)** sets out the Council's commitment to meet part of the district's future energy demands through renewable or low-carbon energy sources. As such, the Council will support small and large scale standalone renewable or low carbon schemes, subject to the degree to which:

- The scale and nature of a proposal impacts on the landscape
- The developer has demonstrated environmental, economic, and social benefits of the scheme, as well as how any impacts (such as noise) can be mitigated against
- The scheme would have an impact on biodiversity
- The proposals reflect local evidence regarding the feasibility of different types of renewable or low-carbon energy at different locations across the district

6.9. **Policy SD4 (Pollution and Water Quality)** emphasises that the Council will protect residents from developments which may generate pollution (air, water, noise, vibration, light, and contamination). Schemes will only be permitted where such adverse effects can be deemed acceptable following mitigation.

6.10. **Policy SD5 (Flood Risk)** states that a sequential approach will be taken to managing flood risk, with new development being guided to the areas with the lowest risk of flooding. On greenfield sites, surface water runoff rates should not be increased, and where appropriate suitable measures to deal with surface water arising from development will be required to minimise the impact from the development.

6.11. **Policy DC1 (Design Considerations)** makes clear that development should be well-designed and reinforce local distinctiveness by positively contributing to and complementing the area's special character and heritage. It should be appropriate to the site and its surroundings, creating a positive sense of place, and protecting the amenity of the area. They should promote the maintenance, enhancement, restoration, and re-creation of biodiversity, and incorporate green infrastructure and landscaping. In addition, sufficient parking should be provided to meet the needs generated by the development.

- 6.12. **Policy DC2 (The Historic Environment)** states that the Council will conserve and enhance heritage assets and their setting. Development proposals should make a positive contribution towards the character of the built and historic environment.
- 6.13. **Policy DC3 (Landscape Character and Settlement Setting)** emphasizes that development will be resisted where it would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the setting of a settlement or important views into and out of a settlement. Development which respects and enhances local landscape character will be supported, as well as those which conserve and enhance biodiversity and natural features of the landscape.
- 6.14. **Policy C3 (Green Infrastructure)** states that the Council will develop a network of high-quality green infrastructure, which supports and improves the provision of open space and recreational facilities, links existing sites of nature conservation value, creates new habitats, increases biodiversity, mitigate the negative effects of climate change, and create appropriate access for a wide range of users to enjoy the countryside (including through improved linkages to recreation opportunities, encouraging walking, cycling, and horse riding).
- 6.15. **Policy NE1 (Biodiversity and Geological Resources)** makes clear that biodiversity and geodiversity must be conserved and enhanced, including habitats and species of principal importance. Where possible, a biodiversity net gain should be achieved which is proportionate to the size and scale of the development. If a proposal would generate adverse impacts which are unavoidable, impacts should be mitigated against, with compensation measures implemented if necessary.
- 6.16. **Policy NE2 (Trees, Woodland, and Hedgerows)** states that the Council will protect existing healthy trees, woodlands, and hedgerows. They should be retained unless the need for, or benefits of, the development outweigh their loss. New developments should deliver a good level of sustainability through tree retention, planting, and soft landscaping – landscaping schemes should mitigate against negative landscape impacts.
- 6.17. **Policy T1 (Development and Sustainable Transport)** requires developments to be located where the highway network can satisfactorily accommodate the traffic which will be generated by the development.

OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework

- 6.18. The Applicant has given consideration to national policy contained in the National Planning Policy Framework (NPPF). The NPPF outlines some key policies that support aspects of this application. The NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development, and has three overarching objectives: economic, social and environmental (**Paragraph 8**).
- 6.19. As part of this focus on sustainable development, the NPPF states the environmental objective of sustainable development is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 6.20. The NPPF states that the planning system should “*support the transition to a low carbon future in a changing climate*” and support renewable and low carbon energy and associated infrastructure (**Paragraph 157**).
- 6.21. Notably, **Paragraph 2** highlights that planning law requires that planning policies and decisions must reflect relevant international obligations and statutory requirements. In this context, the Paris Agreement 2015 and the Climate Change Act 2008 (as amended) set out the United Kingdom’s obligation in relation to combatting climate change.
- 6.22. With regard to supporting a prosperous rural economy, **Paragraph 88** states that planning policies and decisions should enable the development and diversification of agricultural and other land-based rural businesses.
- 6.23. **Section 13** sets out policy guidance in relation to protecting Green Belt land. **Paragraph 152** states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. **Paragraph 153** clarifies that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. **Paragraphs 154 and 155** set out the forms of development deemed not inappropriate in the Green Belt. **Paragraph 156** says that when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development and in such cases,

developers will need to demonstrate very special circumstances if projects are to proceed. However, the NPPF states that such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

- 6.24. **Paragraph 157** states that *“planning should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the re-use of existing resources”*. It also states that it should *“support renewable and low carbon energy and associated infrastructure”*.
- 6.25. **Paragraph 160** states that to help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts).
- 6.26. **Paragraph 163** confirms that, when determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and should recognise that even small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions. It states that LPAs should approve the application if its impacts are (or can be made) acceptable.
- 6.27. **Section 9** considers highways matters. **Paragraph 115** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.28. **Section 14** provides guidance in relation to planning and flood risk, which states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 6.29. **Section 15** relates to conserving and enhancing the natural environment, including from forms of pollution such as noise. **Paragraph 180** states that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. **Paragraph 191** adds that potential adverse impacts from noise which a scheme could generate should be minimised as far as possible. **Paragraph 186**

states that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

National Planning Practice Guidance

- 6.30. The Renewable and Low Carbon Energy section of the NPPG provides further guidance for the determination of planning applications for renewable energy schemes.
- 6.31. The NPPG sets out the particular factors a local planning authority will need to consider with renewable and low carbon energy schemes, which include:
- encouraging the effective use of land by focussing schemes on previously developed and non-agricultural land, provided that it is not of high environmental value;
 - where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements
 - the temporary nature of schemes – planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;
 - the proposal's visual impact, the effect on the landscape and glare and on neighbouring uses;
 - the need for, and impact of, security measures such as lights and fencing
 - great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of renewable schemes on such assets. Depending on their scale, design and prominence, a large-scale renewable project within the setting of a heritage asset may cause substantial harm to the significance of the asset;

- the potential to mitigate landscape and visual impacts through, for example, screening with native hedges;
- the energy generating potential, which can vary for a number of reasons.

6.32. **Paragraph 032** notes the benefits of BESS, stating that it allows for the flexible use of energy and decarbonisation of the grid, allowing for the balancing of the system, maximising useable output from renewable sources, and deferring or avoiding the need for network upgrades and new generation capacity.

6.33. **Paragraph 034** adds that applicants should engage with local fire and rescue services to discuss the siting and location of the battery storage units, and consideration should be given to ensure that emergency services could access the site in the event of an incident. The guidance produced by the National Fire Chiefs Council should also be taken into account.

Grid Scale Battery Energy Storage System planning – Guidance for FRS – National Fire Chiefs Council

6.34. The guidance states that the battery chemistries proposed should be made clear as part of any planning application, as well as the form of the batteries, the type of BESS, the number of BESS units and how they will be laid out, and details of fire-resisting features, fire suppression systems, smoke or fire detection systems, gas and/or electrolyte detection systems, temperature management systems, ventilation systems, exhaust systems, and deflagration venting systems.

6.35. There should be a facility for alerting the emergency services in the event that thermal runaway conditions are detected, as well as detection systems to provide alerts for other types of fires. In addition, units should feature gas monitoring and gas detectors, and audible and visual warning devices. The latter can be linked to a battery management system and detection and suppression system activation.

6.36. Units should include fixed suppression systems, and the guidance encourages that water suppression systems are used rather than gaseous ones, as they are more effective against fires. Furthermore, the BESS containers should have deflagration venting and protection against explosions. Flames and materials should be directed to safe locations, so they do not contribute towards further fire propagations.

- 6.37. Crucially, there should be safe and suitable access into the site. It is advised that there should be two access points for the facility where possible, roads/hard standing to accommodate fire service vehicles, a perimeter road with passing places for fire service vehicles, unobstructed access into the facility, and turning circles and passing places within the site.
- 6.38. The guidance suggests guidance on spacing between units, although this is not a requirement, and smaller distances can be acceptable if justified and considered with other safety measures. It is also advised that there should be at least 25 metres between BESS units and occupied buildings. Moreover, they should not be adjacent to any combustibles, including potentially combustible vegetation within 10 metres of the units.
- 6.39. In terms of water supplies, it is recommended that there should be hydrant supplies for boundary cooling purposes in close proximity to BESS containers, in case of a fire. These should ideally be able to provide at least 1,900 litres of water per minute for two hours but low volumes can be considered acceptable with regard to other safety measures provided. Moreover, there should be suitable signage in the vicinity, highlighting relevant hazards, the type of technology, any suppression systems, and 24/7 emergency contact information.
- 6.40. Lastly, the guidance states that operators should develop a risk management plan, emergency response plan, post-incident recovery plan, and provide environmental protection measures.

Staffordshire Moorlands District Council Design Guide – Supplementary Planning Document (February 2018)

- 6.41. This SPD notes that developments should respond to the character and setting of their surroundings, making a positive contribution to the area. It is important for high standards of design to be achieved, and landscape character should be protected and, where possible, enhanced, with consideration given to views into and out of the site. In addition, existing landscaping should be retained where possible, and there should be plans for good landscaping – the planting of local species can engage the development into the countryside, and schemes should conserve or create opportunities for wildlife.

Legislation and Energy Policy Statements & Strategies

The Climate Change Act 2008

- 6.42. The Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are adapted to. In 2019 the Government amended the Climate Change Act to commit the UK to achieving net zero by 2050.
- 6.43. The Climate Change Act requires the government to set legally-binding 'carbon budgets' to act as stepping-stones to 2050. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period.
- 6.44. The latest (sixth) Carbon Budget was published in April 2021 and enshrined in law in June 2021. This commits the UK Government to reduce emissions by 78% by 2035 compared to 1990 levels, which builds upon the previous commitment to reduce emissions in 2030 by at least 68% compared to 1990 levels.
- 6.45. On 7th October 2021, the UK Government committed to bring forward the date to decarbonise the electricity system to 2035.
- 6.46. Recent events and spikes in the price of natural gas, oil and electricity have starkly demonstrated how important renewable energy and a reliable supply of electricity are to bring energy security and price stability as well as to the achievement of net zero.

National Policy Statement for Energy (EN – 1) (July 2011)

- 6.47. Paragraph 2.2.20 relates to the security of energy supply, stating that it is imperative for the UK to have *"secure and reliable supplies of electricity as we make the transition to a low carbon economy"*. This will require sufficient electricity capacity, including a margin of spare capacity, in order to ensure that demand can be met. Moreover, reliable supply chains, a mix of different fuels and technologies, and effective price signals can also contribute towards achieving security.
- 6.48. Paragraph 3.3.31 states that electricity storage can help to meet demand at peak times. As such, the Government expects storage to play a crucial role within a low carbon electricity system.

National Policy Statement for Energy (EN-3) (July 2011)

- 6.49. It is emphasised in Section 2.4 that proposals for renewable energy infrastructure should demonstrate good design in terms of landscape and visual amenity. Through design,

schemes should be able to suitably mitigate other impacts which proposals may generate, such as noise. Indeed, the Statement notes that Section 10(3)(b) of the Planning Act 2008 requires regard to be given to the desirability of good design.

6.50. With regards to renewable energy development in the Green Belt, Paragraph 2.5.35 explicitly states that very special circumstances which may clearly outweigh harm include the wider environmental benefits which would arise from the increased production of energy from renewable sources.

6.51. With regards to location, Paragraph 2.5.36 acknowledges that most renewable sources can only be developed where the resource exists and where it is most economically feasible.

Proposals regarding the Planning System for Electricity Storage (July 2020)

6.52. In July 2020, the Government published its response to a consultation held on the approach to electricity storage within the planning system. This confirmed that the government will relax legislation to make it easier to construct BESS. In the press release for the report, the Minister for Energy and Clean Growth at the time, Kwasi Kwarteng, noted the importance of BESS in capturing the full value of renewables through making the energy grid smarter.

6.53. The report argues that *“electricity storage is a key technology in the transition to a smarter and more flexible energy system and will play an important role in helping to reduce emissions to net-zero by 2050.”* This is because storage increases flexibility in where and when energy is generated and used, enabling the integration of lower carbon energy sources into the system.

Energy White Paper: Powering our Net Zero Future (December 2020)

6.54. The Energy White Paper (EWP) sets out ambitious plans offering support for a variety of technologies and committing funds to support the growth of low-carbon green-technologies. At the core of the EWP is the commitment to achieve Net Zero and tackle climate change. The Paper provides a strategy to ensure that the UK’s energy system:

- Transforms energy, building a cleaner, greener future for our country, our people and our planet

- Supports a green recovery, growing our economy, supporting thousands of green jobs across the country in new green industries and leveraging new green export opportunities

6.55. Page 5 of the EWP sets out the Government's 'Compelling case for tackling climate change'. The salient points presented by Government are (inter alia):

- We need to act urgently. The future impacts of climate change depend upon how much we can hold down the rising global temperature. To minimise the risk of dangerous climate change, the landmark Paris Agreement of 2015 aims to halt global warming at well below 2°C, while pursuing efforts to limit it to 1.5°C, increasing measures to adapt to climate change, and aligning financial systems to these goals.
- At the global scale, however, we are not presently on track to reach the temperature goal of the Paris Agreement. Based on current national pledges, and assuming the level of ambition does not change, the world is heading for around 3°C of warming by the end of the century.
- The cost of inaction is too high. We can expect to see severe impacts under 3°C of warming. Globally, the chances of there being a major heatwave in any given year would increase to about 79 per cent, compared to a five per cent chance now. Many regions of the world would see what is now considered a 1-in-100-year drought happening every two to five years.
- To meet the temperature goal of the Paris Agreement, the world must collectively and rapidly reduce global emissions to net zero over the next 30 years. Success will mean we are less exposed to flood and heat risks and preserve our national security, our prosperity, and our natural world which are threatened by the global disruption of climate change

6.56. The Government recognises that decarbonising the energy system over the next thirty years means replacing, as far as it is possible to do so, fossil fuels with clean energy technology such as renewables (EWP Introduction, page 9). The EWP identifies how clean energy will become the predominant form of energy, entailing in a potential doubling of electricity demand and consequently a fourfold increase in low-carbon electricity generation (EWP Introduction, page 10). The Government recognises that growing and supporting green jobs

across the country in green industries will also support a green recovery from COVID-19 (page 16).

- 6.57. It is acknowledged that, whilst a net zero system will primarily consist of wind and solar technologies, the system will only be reliable if there are also other technologies, such as battery energy storage systems, to complement them to ensure that demand can always be met. Energy storage and flexibility are named as a priority area within the £1 billion Net Zero Innovation Portfolio, and a target is set for there to be more low-carbon options, including long duration storage, by 2050.
- 6.58. The need for storage is further emphasised in more detail in page 72, where energy storage in batteries will provide “the flexibility needed to match supply to demand at peak hours, or when renewables output is low”, such flexibility will “lower future costs for consumers” and can “be deployed quickly to meet spikes in demand”.

Industrial Decarbonisation Strategy (March 2021)

- 6.59. The Industrial decarbonisation strategy sets out how industry can decarbonise in line with net zero while remaining competitive and without pushing emissions abroad. The strategy recognises that reaching the net zero target will require extensive, systematic changes across all sectors, including industry and emphasises that the 2020s will be a crucial decade to lay the foundation to enable the switch away from fossil fuel combustion to low carbon alternatives, including electrification, hydrogen, and biomass.
- 6.60. The strategy describes that to deliver net zero a minimum of 20TWh of fossil fuel use will need to be replaced by low carbon alternatives in 2030.
- 6.61. The role of smart technologies, such as storage and demand side response, are emphasised in relation to facilitating this transition and the report highlights at page 31 that “smart technologies, such as storage and demand-side response, can also provide flexibility to the electricity system, helping industrial consumers use energy when it is cheapest and cleanest”.
- 6.62. The report makes clear that electricity networks will need to accommodate significant increased demand from the electrification of industrial processes and will therefore need to be fit for purpose to achieve this. Increasing the flexibility of the electricity system will make a positive contribution towards achieving this objective.

The Carbon Budget Order (June 2021)

- 6.63. The UK Government's sixth carbon budget came into force on 24th June 2021 via The Carbon Budget Order 2021. The carbon budget places a restriction on the total amount of greenhouse gases that the UK can emit over a 5-year period and are implemented to drive the requirements contained within the Climate Change Act to reach Net Zero emissions in less than 30 years.
- 6.64. The budget requires a reduction of UK greenhouse gas emissions of 78% by 2035 relative to 1990, a 63% reduction from 2019, which comprises the world's most ambitious greenhouse gas emissions reductions target.

Transitioning to a Net Zero Energy System: Smart Systems and Flexibility Plan (July 2021)

- 6.65. The Smart Systems and Flexibility Plan sets out a vision, analysis, and suite of policies to drive a net zero energy system and replaces the previously published 2017 plan.
- 6.66. The Ministerial Foreword to the Smart Systems and Flexibility Plan, 2021 makes clear that:
- "The government is committed to leading the way in the transformation of our energy system. A smarter, more flexible system will utilise technologies such as energy storage and flexible demand to integrate high volumes of low carbon power, heat and transport and reach a carbon neutral future. A smart and flexible energy system can deliver significant benefits for consumers, the system and the wider economy whilst lowering carbon emissions."*
- 6.67. The Executive Summary emphasises the need to deliver system flexibility quickly:
- "It will be very difficult to achieve the deep power sector decarbonisation needed to achieve the sixth Carbon Budget without significantly higher levels of system flexibility. The need for flexibility will rapidly increase as variable renewable power replaces fossil fuel sources, and we electrify heat and transport. The illustrative scenarios in our analysis indicate the scale of deployment that could be needed. Around 30GW of total low carbon flexible capacity in 2030, and 60GW in 2050, may be needed to maintain energy security and cost-effectively integrate high levels of renewable generation."*
- 6.68. The report highlights that this represents a significant increase in deployment needed relative to the 10GW of low carbon flexibility currently on the system and emphasises that

failure to achieve the targets cited risks the need to have to build more fossil fuel generation instead to maintain energy security in the 2030s.

- 6.69. Whilst the battery storage pipeline is highlighted as growing there is a need to significantly increase the deployment of battery storage to approximately 18GW by 2050.
- 6.70. Chapter 2 states that, by 2030, energy storage should be located in optimal locations and at all scales, with the potential to generate “significant flexibility” to help address the challenges associated with low carbon systems. This will allow energy security and system stability to be achieved. In effect, storage will replace the role that fossil fuels currently play in meeting demand. Long-duration storage has the potential to greatly aid in decarbonising the grid and economy, providing a key service to integrate and maximise the use of low-carbon renewable energy sources. In sum, storage will be “an *essential* part of the solution for an increasingly decarbonised flexible grid” (emphasis added), which is critical to energy security in the future.

National Grid Future Energy Scenario Report (July 2021)

- 6.71. The National Grid Future Energy Scenario (FES) report outlines how the energy system may need to transform to meet the target for net zero emissions by 2050. The need for flexibility to balance supply and energy needs over different timescales is recognised as crucial to the operation of the whole energy system.
- 6.72. The National Grid report highlights the constant need for electricity balancing to keep system voltage and frequency stable and that the need for system flexibility will become increasingly important due to factors such as growth in renewable generation, increasing electrification of heat and transport, and changes in consumer behaviour. Electricity storage capacities will need to increase significantly to support the decarbonisation of the electricity system. Consequently, the need to deploy significant electricity storage forms a key component of each pathway. Within the Executive summary of the report, the 'Key Message 3' on 'Markets and Flexibility' states that "Between 34GW and 77GW of new wind and solar generation could be required to meet demand in 2030" and that "this could require as much as 13GW of new electricity storage in 2030 to help balance period of high and low renewable energy output.
- 6.73. The largest growth in electricity storage capacity is forecast to occur in battery storage. The report also highlights that the policy and regulatory environment will need to change to bring

forward the levels of energy storage required on the system, which may include removal of planning permission barriers.

Sixth Assessment Report, IPCC (August 2021)

- 6.74. The IPCC's Sixth Assessment Report (AR6) addresses the current scientific understanding of the state of the climate, how it is changing and the role of human influence, the state of knowledge about possible climate futures, regional impacts, and how to limit human-induced climate change.
- 6.75. AR6 states that in almost all emissions scenarios global warming is expected to hit 1.5C "in the early 2030s" and that without drastic actions taken today to deliver immediate, rapid and largescale cuts to greenhouse gas emissions, 3C of warming will occur by the end of the century. Restricting temperature rise to no more than 1.5–2C is considered the range that will minimise the likelihood of reaching critical environmental tipping points, beyond which the extent of unabated warming would be catastrophic.

Net Zero Strategy: Build Back Greener (October 2021)

- 6.76. This document reiterates the Government's commitment to meet its net zero target by 2050, with all electricity being generated by low carbon sources by 2035. Increased investment in energy storage and the grid network is cited as a crucial part of the pathway which will deliver this, whilst ensuring that we remain energy secure.
- 6.77. There are also economic benefits to increasing the deployment of battery storage throughout the UK. The report notes that up to 7,000 jobs could be created in the power sector through the increased deployment of storage and flexibility schemes. Furthermore, "the deployment of smart technologies and flexibility will underpin our energy security and the transition to net zero. Flexibility from technologies such as energy storage... could save up to £10 billion per year by 2050 by reducing the amount of generation and network needed to decarbonise".
- 6.78. ***British Energy Security Strategy (April 2022)***
- 6.79. The Government's April 2022 British Energy Security Strategy policy statement forms the Government's latest plan to boost Britain's energy security following rising global energy prices and volatility in international markets.

- 6.80. The Strategy outlines new national commitments to 'supercharge' clean energy and accelerate deployment, with an aim to see 95% of Great Britain's electricity usage from low carbon sources by 2030.
- 6.81. It emphasises the need to smarten the system with pricing which is more flexible, Time Use Tariffs, and battery storage.
- 6.82. It states that the Government will continue supporting the effective use of land by encouraging large scale projects on lower value land where possible and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.

Latest Overarching National Policy Statement for Energy (EN - 1) (November 2023) – Coming into force in early 2024

- 6.83. The most recent National Policy Statement for Energy emphasises the important role that storage will play in ensuring that net zero targets can be achieved, through making the energy system more flexible. The balancing services BESS provide to operators can facilitate the maximization of usable output from intermittent low carbon sources, including solar and wind.
- 6.84. It notes that there is currently 4GW of operational storage within Great Britain, a quarter of which is battery storage.
- 6.85. Paragraphs 3.2.6 – 3.2.7 identify an urgent need for low-carbon infrastructure, with the Secretary of State concluding that substantial weight should be given to this need when determining planning applications (Paragraph 3.2.6 – 3.2.7). Section 4.2 goes further, identifying a critical national priority for this infrastructure, including storage. This is a key priority as it will allow for the decarbonisation of the energy grid by 2035 and achievement of net zero by 2050, as well as energy independence, resilience, and security.
- 6.86. Section 4.7 sets out the criteria for well-designed energy infrastructure. As well as visual appearance, this includes how well it sits within the landscape and functionality. It notes that well-designed infrastructure will ensure that it is sensitive to its place, minimising impacts on the landscape and heritage assets, for example. Notwithstanding, it is acknowledged that energy infrastructure, by its nature, is unlikely to enhance the quality and beauty of an area, and virtually all schemes will have some adverse effects on the landscape – however,

beneficial landscape character impacts can ultimately arise from mitigation. It is made clear that potential impacts on the landscape should influence the design of schemes.

- 6.87. In terms of developing on Green Belt land, as with the currently designated EN-3, it is reiterated at Paragraph 5.11.37 that very special circumstances can include the environmental benefits associated with the increased production of energy from low carbon sources and renewables.

Latest Overarching National Policy Statement for Energy (EN - 3) (November 2023) – Coming into force in early 2024

- 6.88. Paragraph 2.9.9 states that electricity storage is essential for a net zero energy system. The following paragraph adds that the need for storage is greatly rising as we increase the volume of variable renewables and increase peak demand through the electrification of heat and transport. It is also noted that storage will be critical as we shift away from gas.
- 6.89. The rest of the Policy Statement refers to other forms of renewable energy infrastructure.

UK Battery Strategy (November 2023)

- 6.90. The strategy covers batteries and their contributions in a wider sense, and as such is not solely related to battery storage, nor does it explore this in depth. However, it is referenced in parts of the document. For instance, it is noted that the importance of battery technology is increasing, and that this will be key in enabling the transition to net zero. The strategy also notes that BESS can provide 10–20GW of capacity to the UK grid by 2030, and 30–35GW by 2050, which represented the largest installed capacity compared to other storage technologies.
- 6.91. Overall, the strategy seeks for the UK to design and develop the batteries of the future; strengthen the resilience of UK manufacturing supply chains and enable the development of a sustainable battery industry.

7. ASSESSMENT OF THE PROPOSAL

7.1. This section of the Planning Statement provides an assessment of the proposed development against the statutory development plan and material considerations, including the NPPF.

7.2. The key planning matters assessed in turn are as follows:

- Principle of Development
- Green Belt
- Very Special Circumstances
- Design and Layout
- Landscape and Visual Impact
- Transport and Access
- Noise and Amenity
- Ecology and Biodiversity
- Safety
- Heritage
- Arboriculture
- Flood Risk and Drainage

Principle of Development

7.3. The proposed BESS facility is designed for a storage capacity of up to 99.9MW that would be able to release or absorb energy from the power network as needed. The facility needs to be close to an existing substation that crucially has the capability to work with the proposal in terms of supply and demand. The proposal at the Site provides this need connecting to the adjacent existing Cellarhead Substation that crucially has capacity for the development.

7.4. The NPPF is clear at paragraph 163 that applicants do not need to demonstrate or justify the overall need for renewable or low carbon energy projects and recognises the valuable

contribution they make in significantly cutting greenhouse gas emissions, even related to small scale projects. The need to support the transition to a low carbon future in a changing climate and the need to encourage the development of renewable energy resources are core principles of the NPPF. The NPPF is clear that applications for renewable and low carbon development schemes should be approved if their impacts are (or can be made) acceptable.

- 7.5. The proposed development would make a significant contribution to local and national energy policy objectives and legislation relating to renewable energy, as referenced already in this Statement. It will make an important contribution towards decarbonising the energy grid, through providing the necessary balancing services and flexibility to enable a greater reliance on renewable sources such as wind and solar energy generation and a reduction in the use of fossil fuels. This is because renewable energy sources are variable due to factors such as weather conditions. BESS can store energy whilst renewable technologies are at optimum generation and release stored energy into the grid when required, such as when renewable energy generation is low, to ensure a continuous and secure supply of energy, so that demand at peak times can be met. Therefore, in this regard, the scheme complies with national policy and the Development Plan. This includes compliance with Policy SS1 of the adopted Staffordshire Moorlands Local Plan, as it will make a positive contribution to bringing environmental and sustainability benefits not just to the District, but to the wider County and Country. Its delivery will directly work towards reducing emissions and tackling climate change; and the Council is committed to supporting low-carbon schemes as stated in Policy SD2 of the adopted Local Plan.
- 7.6. As such, it is apparent that BESS is a highly important technology which will play a significant role in helping to mitigate and decelerate climate change, along with other renewable and low carbon measures.
- 7.7. The policy support for renewable energy and associated development given in the NPPF is caveated by the need for the impacts to be acceptable, or capable of being made so. Nevertheless, the energy storage benefit of the proposal must be accorded substantial weight and this is consistent with numerous recent Planning Inspectorate appeal decisions in which Inspectors have attributed substantial weight to the energy storage benefits of schemes similar to this one. This includes recent appeal references APP/C3430/W/22/3292837 (Land west of Wolverhampton West Primary Substation) and APP/N5090/W/22/3298962 (Land west of National Grid Mill Hill Substation).

- 7.8. Whilst the Site is located in a rural area, it meets the tests of Local Plan Policy SS10 given that there is an essential need for the scheme to be sited in this particular location by virtue of its nature and the Site's proximity to the Cellarhead Substation, which it will connect to in order to provide the required balancing services.
- 7.9. As set out in more detail below, the scheme is of a suitable scale and the proposed landscaping strategy will ensure that the local landscape character and distinctiveness are respected and enhanced, with any landscape impacts mitigated against, in line with Local Plan policies SD2 and DC3. Considerations of the Green Belt context of the Site are outlined including outlining the required 'very special circumstances'.

Green Belt

- 7.10. The Site forms part of the Stoke on Trent Green Belt. The Development Plan via policies SS2 & SS10 of the adopted Local Plan rely on national policy for Green Belt considerations and are therefore consistent with national policy in this regard. Paragraphs 154 and 155 of the NPPF set out the forms of development deemed not inappropriate in the Green Belt. The proposed development does not fall into any of the identified categories in this context. In line with national policy, it therefore represents 'inappropriate development' in the Green Belt which is by definition, 'harmful' to the Green Belt. As such with reference to paragraph 152 of the NPPF, 'very special circumstances' are required in order for this application to be approved. In line with Paragraph 153 of the NPPF, very special circumstances will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 7.11. Paragraph 142 of the NPPF states that the essential characteristics of Green Belts are their openness and their permanence. It is accepted that the development would reduce openness as a previously open field would be developed for this BESS proposal. In addition, the proposal would involve the development of a very small part of the countryside that is currently undeveloped and would thus constitute encroachment into the countryside, contrary to one of the five purposes of the Green Belt (the third purpose), outlined in the NPPF, and correspondingly the encroachment into the countryside would cause harm to the Green Belt. As outlined in the Green Belt Statement that forms part of the submitted accompanying LVIA, it is therefore accepted that the reduction in the openness of the Green Belt and the encroachment into the countryside means that the proposed development would cause some limited harm to the Green Belt.

- 7.12. The other four purposes of the Green Belt are set out at paragraph 143 of the NPPF. The first, to check the unrestricted sprawl of large built-up areas, is not relevant to the proposed development as it is not adjacent to any large built-up area. This also applies to the second purpose, to prevent neighbouring towns merging into one another. The fourth purpose is to preserve the setting and special character of historic towns. The proposed development is not located in close proximity to a historic town or urban area (such as Oxford). The fifth purpose, to assist in urban regeneration, is also not relevant for the Site as the need for this development relates to the adjacent substation and there are no urban sites that can fulfil this need as an alternative. Also with regard to renewable schemes more generally it is established through appeals that not only would it not be cost effective to locate renewable schemes on previously developed land due to land values and rates of return, but that the reuse of previously developed land for renewable schemes would not secure the most efficient or optimum reuse of such land as it would only be for a temporary period of time. As an example, the position was taken by the Inspector in appeal reference APP/W1525/W/22/3300222, related to a solar and BESS development scheme, and considered that appeal proposal would not be in conflict with this purpose of the Green Belt. The Applicant submits that this would also apply in this case.
- 7.13. Returning to the essential characteristics of the Green Belt, openness and permanence; it is acknowledged that the proposal would compromise openness, however this would not be permanent due to the restricted lifespan of the proposed development. Once the development has reached the end of its lifespan the development can be removed, and the land returned to agricultural use. The proposals would therefore not have a permanent 'harm' to openness.
- 7.14. Paragraph 156 of the NPPF states that elements of many renewable energy projects will comprise inappropriate development however the necessary 'very special circumstances' may include the wider environmental benefits associated with increased production of energy from renewable sources.
- 7.15. The judgement of Sullivan J. in *R (Basildon DC) v First Secretary of State and Temple* [2004] EWHC 2759 (Admin) confirmed in relation to very special circumstances ("VSCs") that "*a number of factors, none of them "very special", when considered in isolation may, when combined together, amount to very special circumstances*". Thus, for example, in this case the ecological enhancements and local economic benefits of the proposal, discussed further

below, may not in themselves amount to very special circumstances, but they can, and do in this instance, contribute to establishing such.

- 7.16. The following section sets out the very special circumstances which are applicable here, building a robust case as to why planning permission should be granted for this particular proposal.

Very Special Circumstances

- 7.17. Having regard to the Development Plan and national Green Belt policy, it is necessary to balance the benefits and other considerations against any harm to the Green Belt which the proposal would cause, plus any other harm. In carrying out this balancing exercise, substantial weight should be given to harm to the Green Belt in accordance with paragraph 153 of the NPPF, with harm attributed by reason of inappropriateness, as well as the inherent harm to the openness of the Green Belt and encroachment into the countryside, as discussed above.
- 7.18. The proposal is considered to be acceptable in landscape and visual terms as discussed further below and in the accompanying LVIA. The degree of harm that the proposal would cause in landscape & visual terms would be limited, as set out in the LVIA. No other harm would be caused by the proposals as discussed further below and in the associated accompanying reports submitted with this application.
- 7.19. As noted above, the proposal would make a valuable contribution to local and national energy policy objectives and legislation relating to renewable energy and climate change; and ultimately provides very clear and significant environmental, economic and social benefits to the area. These clear and demonstrable benefits comprise the very special circumstances of this proposal with regard to Development Plan and national Green Belt policy.

1) The scheme will contribute towards the achievement of climate targets

- 7.20. Climate change poses a challenge globally and requires all nation states to take drastic action to reduce greenhouse gas emissions so that warming is limited, as noted by the IPCC in their *Sixth Assessment Report*. At an international scale, the UK is bound by the Paris Agreement, a legally binding treaty signed in 2015 to limit global warming below 2°C. However, as noted in the Energy White Paper, we are not on track to meet this. Paragraph 2 of the NPPF makes clear that planning decisions should support international obligations, including the Paris Agreement. If permitted, this proposal would do exactly that, through providing the balancing

services that are required to transition from polluting fossil fuels to renewable energy sources such as wind and solar, as discussed above. The resulting reduction in emissions would help to mitigate global warming and ensure that the UK fulfils its obligations as part of the Paris Agreement, playing a leading international role in the race to net zero and fight against climate change.

- 7.21. Nationally, the Climate Change Act (as amended) sets an ambitious target for the UK to reach net zero emissions by 2050. In order to realise this, the legislation emphasises that greenhouse gas emissions will need to be reduced, with the Sixth Carbon Budget committing to a reduction in emissions of 78% by 2035 (compared to 1990 levels), and the Government seeks to decarbonise the energy system by 2035. Paragraph 2 of the NPPF also states that decisions should reflect national statutory requirements. As stated above, through facilitating a transition to more renewable sources, BESS has the potential to greatly reduce emissions which arise from the use of fossil fuels and achieve net zero, as explicitly stated in the *Overarching National Policy Statement for Energy and Proposals regarding the Planning System for Electricity Storage*. Meanwhile, the *Net Zero Energy System: Smart Systems and Flexibility Plan* notes that it will be difficult to decarbonise the energy system and meet the Sixth Carbon Budget without greater flexibility, which BESS provides. The scheme will play a part in helping to decarbonise the energy system so that the UK can meet its targets.
- 7.22. Locally, Staffordshire Moorlands declared a climate emergency in 2019. As part of this, the Council unanimously voted in favour of plans for the district to become carbon neutral by 2030. In addition, the Council joined the 'Race to Zero' global coalition of regions in 2021, highlighting its commitment for the district to achieve net zero emissions by 2050. The Staffordshire Moorlands Climate Change Plan followed in 2021/22. The proposal has the potential to play a significant role in helping to ensure that Staffordshire Moorlands successfully meet this goal.
- 7.23. Therefore, the proposed BESS facility will make a contribution towards the achievement of international, national, and local climate ambitions. There is an urgency to take drastic action to ensure this is the case, especially considering that many targets are not on track to be met. It is incumbent on decision-makers at all scales to help ensure that legally binding targets and goals are achieved. Permitting this scheme would help to do so. The beneficial national and international consequences which would arise from the development (in helping to reduce emissions, curb global warming, and meet targets), constitutes a significant part of

the VSCs which should be given substantial weight. As noted above this is in line with appeal decisions such as references APP/C3430/W/22/3292837 (Land west of Wolverhampton West Primary Substation) and APP/N5090/W/22/3298962 (Land west of National Grid Mill Hill Substation).

2) *There is a specific need for additional battery storage schemes in the United Kingdom*

- 7.24. As noted above, there is a pressing need for additional battery storage schemes in order to transition to renewable sources at scale and fulfil the above. Due to the variable nature of renewable technologies based on factors such as weather conditions and varied demand throughout different times of the day and year, storage will play a crucial role in ensuring a secure energy system which is able to meet demand at peak times. The important role that battery storage will play in combatting climate change has been acknowledged at Government and national level such as in the in the National Policy Statement for Energy (NPS), Energy White Paper, National Grid Future Energy Scenario Report, and the Net Zero Energy System: Smart Systems and Flexibility Plan, with the latter saying that it is “*an essential part of the solution for a decarbonised grid*”. Additionally, the NPS advises that storage is needed to reduce the costs of electricity and increase its reliability. The proposal would therefore also contribute toward local energy security which is extremely important particularly at the current time of geopolitical tensions.
- 7.25. Both the Government and National Grid wish to see a wider deployment of battery storage in the coming decades. Energy storage is identified as a priority area within the *Net Zero Innovation Portfolio*. National Grid’s Future Energy Scenarios (2021) advises that currently the energy storage capacity in the UK is 4GW and by 2050 it is anticipated that 40GW of capacity would be required in order to meet the UK’s target of net zero carbon by 2050. Although the scheme is modest in size, paragraph 163 of the NPPF confirms that even “*small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions*”.
- 7.26. There are benefits to multiple sites in an area being developed for BESS, as the greater the amount of storage, the greater the degree of flexibility and energy security, allowing for more of the grid to be decarbonised, and a more significant reduction in emissions. The proposal Site will make a valuable contribution towards increasing battery storage capacity within the UK in line with the NPPF.

7.27. The Site is well-located given that it sits immediately adjacent to the Cellarhead Substation. *The Net Zero Energy System: Smart Systems and Flexibility Plan* states that storage should be sited in optimal locations, and this is the case here. From a practical and visual perspective, placing an energy storage facility adjacent to existing National Grid infrastructure will enable a straightforward connection to the grid, and it is desirable to construct a facility here rather than in an isolated location surrounded by undeveloped open countryside, some distance from the nearest connection point. This makes it a preferential site for a BESS facility compared to others in the Green Belt, where the impact could be more harmful. As such, this is a suitable and logical location for energy storage to meet local energy demand and serve as Staffordshire Moorlands' contribution towards increasing capacity nationwide by 2050.

7.28. Given the need for additional battery storage within the UK, so that the grid can be fully decarbonised, as many BESS schemes as possible should be permitted in order to increase capacity to the 2050 requirements. Being located adjacent to a substation and National Grid infrastructure, the Application Site is appropriate to help meet the need for additional storage. This consideration in combination with the environmental benefits discussed above carry substantial weight. This strengthens the case to grant planning permission for the scheme, given the contribution it will make towards meeting national and local need in a highly optimal and sustainable location.

3) *The development will deliver ecological and arboricultural benefits*

7.29. The proposed landscape strategy, which will limit visual harm to the Green Belt and landscape, comprises the planting of new woodland to screen the development and additional hedgerow and wildflower planting. This will increase the richness and diversity of flora and fauna on the Site. The scheme will create enhanced opportunities for biodiversity and ecology; indeed, the biodiversity net gain metric produced by Enzygo, submitted with this application, indicates that the proposal will achieve a 99% gain for hedgerow units and 15.49% gain for habitat units. These calculations exceed local and national biodiversity net gain requirements at the time of the application submission (which simply require a net gain – unspecified), and these will be delivered through the delivery of the proposed landscaping strategy scheme, which can be covered via a suitably worded planning condition.

7.30. The provision of these combined ecological and arboricultural benefits is an additional consideration that forms part of the VSCs which should be given great weight – this aspect

of the development is supported by Local Plan Policies SD2, DC1, C3, and NE1, as well as Paragraph 180 of the NPPF and Paragraph 13 (ref: 5-O13-2015037) of the NPPG.

4) The temporary and reversible nature of the scheme

7.31. As with other BESS schemes, this development will only be temporary, with a lifespan of forty years. After this point, it will be decommissioned, with the battery containers and associated infrastructure removed. This forms part of the VSCs as, unlike other types of developments which may permanently modify the character and openness of the Green Belt, having some impact (even if limited) on views and openness, this development will be removed from the landscape after forty years, leaving only the boundary planting and associated biodiversity benefits it will deliver. Therefore, the scheme will generate no harm whatsoever to the Green Belt in the long term.

7.32. The temporary and reversible nature of the development is another element that contributes to the very special circumstances of the proposal, as it reduces the landscape & visual impacts and harm to the Green Belt in comparison to permanent forms of development.

5) Use of Poor Quality Agricultural Land

7.33. Crucially, the Site comprises of poor quality agricultural land (Grade 4 – Poor Quality), which makes it a preferential greenfield site to develop in line with Local Plan Policy SD1 and Paragraph 013 (Ref ID: 5-O13-20150327) of the National Planning Practice Guidance. Footnote 62 of the NPPF is clear that areas of poorer quality land should be preferred to those of a higher quality (which is the case in this instance).

7.34. The use of non-BMV (Best and Most Versatile) agricultural land also contributes to the VSCs of the proposal.

6) Economic Benefits and Investment

7.35. The proposal would contribute to the local rural economy, assisting with the future viability and stability of a rural farming business, through rural diversification. It is well established in appeals, that there is a pressing need to diversify farm businesses, due to the variable and volatile nature of farming income. A regular income from the proposed facility would be an invaluable support for the farming business to remain financially viable. Rural diversification is supported by Local Plan policy SS10.

- 7.36. It will take approximately six to nine months to construct the BESS facility. The proposal would contribute to the local economy through the creation of employment opportunities in engineering, construction and transportation during the construction and ongoing management of the Site, including business rates and the ongoing management of landscape and biodiversity.
- 7.37. In addition, the development would support the Government's ambition to create an environment which welcomes inward and foreign investment, such as in battery manufacturing, as set out in the UK Battery Strategy (2023). This notes that having easy access to the grid, allowing for sustainable and competitively priced electricity, can assist with encouraging battery supply chain investment within the UK.
- 7.38. These benefits should be taken into consideration as part of the VSCs and can be attributed modest weight.

Summary

- 7.39. In summary, having regard to planning policy and associated material considerations discussed above providing clear support for renewable and low-carbon energy schemes, including specifically battery storage schemes, the development is considered to be appropriate as a matter of principle in this location, subject only to technical considerations, which are assessed below.
- 7.40. The combined substantial benefits and considerations of the proposal, as outlined above, clearly outweigh the identified harm to the Green Belt, and other harm identified, and therefore constitute the necessary very special circumstances required to accord with Development Plan and national Green Belt policy.

Design and Layout

- 7.41. As discussed in Section 4 of this Statement, the scheme comprises of a smaller scale scheme compared to previous withdrawn BESS proposals at this Site. The layout has been shaped by the need to mitigate landscape and visual impacts and reduce impacts to the Green Belt as well as ensure that it meets relevant safety standards and provide sufficient acoustic attenuation. These matters, as well as others detailed considerations related to the layout, such as drainage and ecology considerations, are discussed in more detail below. The design of the infrastructure proposed is in keeping with that of the adjacent Cellarhead Substation.

Meanwhile, the scheme will incorporate landscape enhancements and introduce new green infrastructure softening and screening the development in the wider context of the surrounding area. It is therefore considered that the proposal accords with Policy DC1 of the Local Plan with the proposal designed to ensure compatibility and integration with its surroundings.

- 7.42. A site investigation comprising a desk study (Phase 1 Geoenvironmental including a Conceptual Site Model) and intrusive ground investigation (Phase 2 Geoenvironmental and Geotechnical) has been undertaken to provide information on the ground conditions at the Site to inform the design of the proposed works and to provide an assessment of any likely geochemical contamination of the Site. The findings are outlined in the accompanying Ground Conditions report which demonstrates that there would be no unacceptable geoenvironmental risks and that the proposed development including the proposed earthworks and bund design can be safely and appropriately delivered, as shown on the submitted Acoustic Bund Details drawing and Cut and Fill Plan.

Landscape and Visual Impact

- 7.43. As set out in the LVIA, the Site sits within the context of the existing neighbouring substation, which is a dominating feature with prominent pylons. This, combined with the fact that Newfields Farm and its agricultural buildings sit in close proximity, gives the Site a semi-rural feel where the Green Belt's openness has already been somewhat compromised. The Site is enclosed by the substation development (to the north and east), boundary vegetation, and tree belts, with there being no high points from which the Site is visible in long distance views.
- 7.44. The scheme proposes a landscaping strategy to minimise the landscape and visual effects, in accordance with Local Plan Policy SD2. As already outlined, this will include an earth bund to the west, with wildflowers on the inner side, and trees and scrubs planted on top and the outer side; use of the latter is encouraged by Policy NE2 of the adopted Local Plan.
- 7.45. In terms of landscape character effects, with the landscaping strategy in place, the development will have a less than negligible effect on the character of the Potteries and Churnet Valley National Character Area. Although there will be a moderate adverse impact on the landscape character type during construction, this will reduce to moderate/minor adverse by year 15 within the Site itself, and there will only be a negligible impact on the character of the wider landscape character type. Likewise, the impact on the Site's character

in general will reduce to major-moderate on completion. Thus, through providing integration with the landscape and screening in an already enclosed location, the scheme would result in limited effects on landscape character, in line with Local Plan policies SD2, NE2, DC1, DC3, and NPPF Paragraphs 135 & 160.

- 7.46. With regards to visual effects, due to the Site's context adjacent to the Cellarhead Substation, existing enclosures, and further screening set to be provided by the proposed earth bund, there will be very limited impacts on local visual amenity, with any effects limited to the immediate environs, including the footpaths surrounding the Site. This means that the landscape strategy successfully mitigates against any harmful visual impacts, as stipulated by Policy SD2 and Paragraphs 135 & 160 of the NPPF. Furthermore, due to fact that existing electrical infrastructure associated with the substation is already highly visible when looking towards the Site, there will not be a notable change to views towards the Site. The proposed development would result in limited effects on visual amenity, restricted to the Site and its immediate environs, and experienced in the context of the existing Cellarhead substation.
- 7.47. In designing the landscaping strategy, the potential cumulative impact of schemes in the surrounding area has also been taken into account. Following mitigation measures, these would be limited to perceptual or experiential effects on landscape character when the scheme is viewed from the south of the substation and users of the Cheddleton 60 footpath who will pass by all three BESS schemes. However, it is important to note that they would be viewed in the context of the existing substation. These minor cumulative impacts will be greatly reduced over time as the landscaping and planting for all three scheme grows and matures. Thus, cumulative impacts will be suitably addressed, as per NPPF Paragraph 160.
- 7.48. In terms of the Site's location within the Green Belt, it is accepted that the proposal would generate some very limited harm to the openness of the Green Belt, within a very small area, and in the context of the existing substation, as it would further reduce openness in this location. When considered with the encroachment into the countryside, it is accepted that the proposed development would cause some limited harm to the Green Belt. In landscape and visual terms, the semi-rural character (farmland, but adjacent to existing energy infrastructure development and the farm buildings at Newfields Farm) and well enclosed nature of the site, would mean that the proposed development would result in limited landscape and visual impacts. Notable effects would be experienced only within the Site and

its immediate environs, and in the longer term these effects would result in only limited harm to the openness of the Green Belt.

- 7.49. The submitted Illustrative Landscape Cross Sections contained within the LVIA help show the acceptability of the scheme in terms of its appropriate siting and screening in the landscape, including the benefits of the proposed landscape strategy bund and planting.
- 7.50. Overall, as concluded in the LVIA, the landscaping strategy will provide effective mitigation which will ensure that overall landscape and visual impacts are limited. The proposal with its landscape strategy will respect the existing landscape and its character, achieving integration with existing surrounding woodland, tree belts, and the undulating topography. This will contribute towards reinforcing local distinctiveness and integrating with the landscape as best possible, according with the requirements and spirit of relevant planning policies, namely Local Plan Policies SD2, NE2, DC1, DC3, as well as provisions of the NPPF.

Transport and Access

- 7.51. The accompanying Transport & Access Statement assesses the levels of traffic the scheme would generate. During the construction phase, it is anticipated that, over the course of 26 weeks, there will be 320 HGV deliveries, which equates to two HGV deliveries per day, or four movements. During peak weeks of construction (amounting to approximately five weeks), this will increase to three HGV deliveries per day, or 6 movements. Furthermore, it is anticipated that the average day would see 60 two-way movements from staff. Overall, it is concluded that this is within daily traffic variations and therefore the scheme will only have a negligible impact on the highway. During the lifetime of the development, the impact will be significantly less, as just 12 trips per year are anticipated (for maintenance purposes). Given that the highway network will clearly be able to accommodate the traffic generated, the scheme complies with Policy T1 of the adopted Local Plan. Furthermore, the assessment finds that the development would not give rise to any adverse impacts on highway safety. Therefore, the proposal is fully compliant with Paragraph 115 of the NPPF, which means that there are no highway grounds on which to refuse the application.
- 7.52. As outlined in Section 4 above, the Site will be accessed via an existing private access track off Rownall Road. The Transport & Access Statement notes that this access point is suitable, with acceptable visibility splays and the necessary geometry to allow HGVs to enter/exit the

Site. Given that this access point is safe and satisfactory, the proposal complies with Local Plan Policy DC1 in this respect.

- 7.53. The development will provide three parking spaces to the east of the compound, able to be used by staff and/or those visiting the Site for maintenance purposes. The provision of these spaces accords with Policy DC1, which requires schemes to provide sufficient parking – following construction, with only ~12 trips per year, this number is more than sufficient for the lifetime of the facility. The proposal provides adequate access dimensions, with looped road and passing point to allow safe and sufficient access for all vehicles, including construction and emergency vehicles.

Noise and Amenity

- 7.54. A Noise Impact Assessment has been prepared and submitted with the application. It assesses whether the facility would generate unacceptable noise impacts on local receptors. The nearest property to the Site is the farmhouse at Newfields Farm, located immediately to the south. However, the Noise Impact Assessment explains that this is correctly discounted as a noise receptor, given that it will not be used as a dwelling for the lifetime of the development. A legal agreement between the Applicant and the landowner has been signed to ensure that this will be the case – they will not live in the dwelling and no tenants will be permitted to live in the property until the facility is decommissioned.
- 7.55. The assessment finds that the noise levels which would be generated by the scheme would be considerably higher than existing background noise levels. As a result, a robust noise mitigation strategy is proposed. This comprises the erection of a 4 metre acoustic fence along the eastern and southern edges of the Site, and a 5 metre acoustic barrier on the western boundary. The western barrier will comprise the bund with fencing on top as already discussed. With this strategy in place, the report concludes that the noise impact would be low. As the proposal incorporates these measures, it will not generate unacceptable and adverse noise impacts. The nature of the scheme means that there would be no potential for odour or light pollution and suitably worded planning conditions can cover construction activities and timings as well as external lighting. Therefore, the scheme will accord with Paragraphs 180 and 191 of the NPPF, as well as policies SD2, SD4, and DC1 of the adopted Staffordshire Moorlands Local Plan.

Ecology and Biodiversity

- 7.56. The landscaping proposed as part of the scheme will provide benefits for biodiversity. As discussed, the earth bund will have trees and wildflowers planted on it, and further habitats will be created as part of the additional planting to the north and south of the facility, including within the stretches of native hedgerow. As a result, the proposal will achieve a 99% gain for hedgerow units and 15.49% gain for habitat units, exceeding the requirements of Local Plan Policy NE1 and Paragraphs 180, 185 and 186 of the NPPF.
- 7.57. An Ecology Walker and Assessment note has been submitted as part of the application. This should be read further to the previous associated Preliminary Ecological Appraisal undertaken also submitted with this application. The Ecology Walker and Assessment identifies that the scheme will not have a harmful impact on local ecology, with precautionary measures implemented in case there are great crested newts (there is a low probability that they are present); adherence to pollution prevention guidelines so that the watercourse to the west is protected; appropriate and sensitive lighting which does not disturb or harm any species; and fencing to protect boundary habitats during construction. In ensuring that the Site's existing and surrounding ecology and habitats are protected and enhanced (through the new landscaping and biodiversity net gains), the proposals fully accord with policies NE1 & C3 of the adopted Local Plan.

Safety

- 7.58. The safety of the scheme has been a paramount consideration in the design of the proposal, with the National Fire Chiefs Council (NFCC) guidance taken fully into account. Lithium ferrophosphate batteries were selected partly as they are safer compared to other lithium-ion batteries. They have lower temperatures, only generating a minimal amount of heat. In addition, liquid-cooling cell to pack technologies further stabilise temperatures, and additional protection is provided through the multi-layered prismatic cell, which ensures good thermal conductivity and cooling performance. The temperature of all cells will be closely monitored to ensure they remain within the safe range of 15°C and 33°C. Further details of the equipment are set out in the accompanying submitted Outline Battery Safety Management Plan produced by Enzygo.
- 7.59. The Applicant has engaged with the Staffordshire Fire and Rescue Authority, as encouraged by Paragraph 034 (Reference ID: 5-034-20230814) of the PPG. The Authority indicated that the following should be considered specifically in relation to safety:

- 1) Risk prevention through design
- 2) Assessing water supplies and drainage
- 3) Providing good access
- 4) Environmental damage control infrastructure e.g., controlling contaminated firewater runoff.

7.60. The scheme has been designed to minimise any risks which may arise from the BESS technology, with all components complying with best practice guidance (including the NFCC guidance) and legislation, as set out in the submitted Outline Battery Safety Management Plan.

7.61. In summary, there are automatic fire detection and suppression systems within the design, as well as redundancy measures to provide protection. Furthermore, through the use of fire-resistant materials and sufficient separation distances between equipment, the spread of fire can be restricted and contained. Other design features include the inclusion of sensors which will monitor temperature, smoke, and gases. Should there be an emergency, aerosol fire suppression systems in the BESS cabinets can be triggered. These systems mean that fires would be contained within the effected cube. The design also responds to the Allianz Risk Consulting Battery Energy Storage System Design Recommendations.

7.62. The facility will be connected to mains water. A pre-development enquiry was made with Severn Trent Water, and the water company confirmed that this will be possible. This means that there will be a sufficient supply which could be used in the event of a fire.

7.63. As recommended in the NFCC advice, the BESS facility benefits from two access points into the main BESS compound, which will be unobstructed; the front access point in the south, and a perimeter road around the facility exists to allow vehicles to enter/exit from the north if required. This will allow for an emergency access point if this is ever needed. The rest of the facility, including the substation, can also be accessed from this perimeter road. There is sufficient space along here, and to the south, for a fire service vehicle to stop. A layby is also proposed along the existing farm access track just before Newfields Farm, this will provide a passing place which can be used by emergency vehicles.

- 7.64. Appropriate environmental damage control infrastructure will be used, to be agreed with the Council and relevant consultees. Measures to contain fire water in the unlikely event of a fire have been designed into the development proposals, these include the use of a stop valve on the attenuation tank to stop potentially contaminated water from entering the tank and also, as noted in the Outline Battery Management Plan, the use of an oil interceptor to capture any potential pollutants. These measures have been discussed with SFRS who noted there are several options for containing, capturing and potentially recycling fire water and the Applicant will continue to liaise closely with SFRS as the project moves forward.
- 7.65. As a result of discussions with Severn Trent Water, a location was successfully identified for a standard 90mm water connection, which is considered to be sufficient for provision of a suitable fire hydrant. In line with guidance from Severn Trent Water, a fire hydrant will be provided within the Site to be confirmed at a later date. The details of this could be covered by a suitably worded planning condition where considered necessary. The fire hydrant will be easy to access in the unlikely event of a fire and will also be in line with recommendations from SFRS in regards for the required distance from the hydrant to the development. Whilst the flow or pressure cannot be guaranteed, SFRS acknowledge that this is a standard limitation for all water companies when it comes to new hydrant connections.
- 7.66. The Applicant has demonstrated that the development can be delivered in an entirely safe manner and crucially in the unlikely event of a fire there are several measures proposed to prevent thermal runaway and spread, allowing any event to be quickly isolated. The Applicant is happy to have continued discussions with the Council and SFRS to deliver the necessary safety measures required.

Heritage

- 7.67. A Built Heritage and Archaeological Assessment has been produced and forms part of this application. The Site itself is not designated for any purpose and there are no heritage assets within or immediately adjacent to it. Within 1km of the Site, there are no scheduled monuments, registered parks and gardens or conservation areas. There are two Grade II listed buildings within this area; Stables to Rownall Hall (NHLE 1188808) and Milestone at SJ 943 475 (NHLE 1374659). The Assessment concludes that the scheme would not have an adverse impact on the significance of these assets as there will be no changes to their settings. This means that the local historic environment will be effectively conserved in line with Local Plan Policy DC2.

- 7.68. The Assessment also concludes that there is low potential for significant archaeological remains within the Site, given its context and existing use as farmland. Notwithstanding this, additional discussions are required with the Local Authority Archaeological Officer to determine whether further archaeological investigations are required. If such investigations were required, then they could be covered by a suitably worded planning condition.

Arboriculture

- 7.69. There are 95 individual trees on the Site, of which 2 are Category A (the highest grade), 60 are category B, 47 are category C, and 6 are category U. All these trees will be retained as part of the proposal and protected, as recommended in the Arboricultural Impact Assessment. This will be done through a range of measures to ensure that the highest quality trees will not be impacted by construction processes including the installation of associated required underground electricity cables.
- 7.70. Moreover, the proposal will go further by increasing tree cover on the Site through the planting of new woodland as part of the proposed landscaping strategy. There would also be a significant increase in hedgerow planting. As the development will retain, protect, and introduce new trees and hedgerows, it accords with both the requirements of Local Plan policies NE2 & C3 as well as the Council's Tree Strategy. As discussed earlier in this statement the combined arboricultural and ecological benefits of the proposal should be attributed great weight in the planning balance.

Flood Risk and Drainage

- 7.71. The submitted Flood Risk & Surface Water Drainage Assessment demonstrates that the scheme will not increase surface water runoff, nor the risk of flooding at the Site and elsewhere. Indeed, the Assessment shows that the proposed development will considerably reduce the flood risk posed to the Site and to off-site locations due to the adoption of the proposed drainage strategy. This means that the proposal fully accords with policies SD4 & SD5 of the adopted Staffordshire Moorlands Local Plan.
- 7.72. As noted above in respect to fire safety considerations, the Applicant has made contact with Severn Trent Water. A water connection for a fire hydrant has been confirmed with the exact location to be determined at a later date. The drainage strategy includes an attenuation tank, control chamber and headwall.

8. CONCLUSION

- 8.1. This Statement has been prepared on behalf of Newfields BESS Ltd (the "**Applicant**") and supports an application for full planning permission on land at Newfields Farm, Rownall Road, Wetley Rocks, Staffordshire, ST9 OBS (the "**Site**").
- 8.2. The description of development reads as follows:
- "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."*
- 8.3. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. As set out in the Assessment section of this Statement, it has been established that the proposed development complies with the Development Plan and therefore should be approved without delay in accordance with Paragraph 11 of the NPPF.
- 8.4. The proposed development will make an important contribution towards decarbonising the energy grid, through providing the necessary balancing services and flexibility to enable a greater reliance on renewable sources such as wind and solar energy generation and a reduction in the use of fossil fuels. Local and national planning policy along with relevant legislation and guidance, as outlined in this Statement, provide clear in-principle support for renewable and low carbon energy schemes such as this. There is also a clear established need for BESS facilities across the Country, which will assist in improving local and national energy security, which is a notable benefit, particularly at a time of geopolitical tensions that impact the availability and price of imported energy sources.
- 8.5. In terms of landscape and visual impact, the Site is well-enclosed and the scheme would be viewed in the context of the existing Cellarhead Substation, which can be seen in views towards the Site. The robust proposed landscaping strategy will provide an earth bund and extensive planting which will screen the development to minimise adverse impacts on the surrounding landscape and views. Once implemented, the strategy will make the scheme entirely acceptable in this regard and the accompanying LVIA concludes that the proposed

development would result in limited effects on landscape character and visual amenity, restricted to the Site and its immediate environs, and experienced in the context of the existing Cellarhead substation.

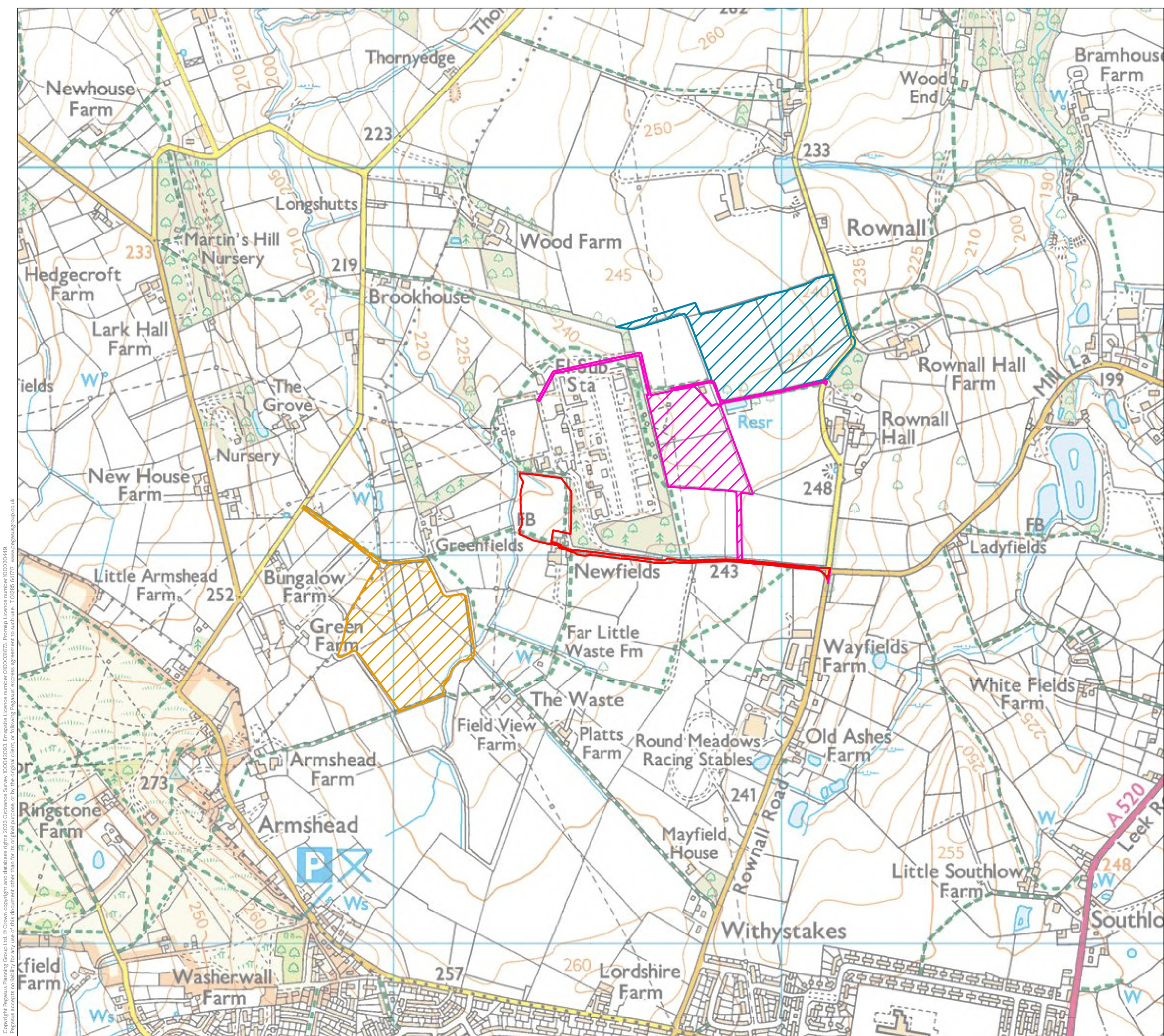
- 8.6. With regards to other technical considerations, the reduction in the scale of the facility compared to the previous application for BESS at this Site and proposed noise mitigation strategy will ensure that noise levels are entirely acceptable in the context of the surrounding area, addressing previous concerns raised. There would be no other amenity impacts. The traffic generated during the construction process would be entirely acceptable, and safely accommodated by the local road network, and there will be highly infrequent visits to the Site during the 40 year operational lifespan of the development. It has thus been demonstrated that there would not be any adverse impacts on highway safety or the road network, meaning that the development is acceptable in highways terms. The scheme would not adversely affect any heritage assets through changes to their settings, and the submitted Flood Risk & Surface Water Drainage Assessment demonstrates that the flood risks of the development to the Site and surrounding area can be suitably mitigated resulting in no flood risk and drainage impacts to the area. Safety is an important consideration, and the choice of batteries, technologies, design, and monitoring complies with the guidance from the NFCC to ensure that the facility does not pose a risk to the environment or the public. There are safe and suitable unobstructed access points, which can be used by emergency vehicles if required, and a connection to mains water. The proposal, subject to the mitigation outlined in the accompanying reports, would be entirely acceptable in terms of amenity, safety, flood risk, drainage, heritage and transport considerations. Furthermore, it has been shown that the proposal would deliver notable arboricultural and ecological benefits, which is a material consideration in favour of this proposal.
- 8.7. The Site is located within the Green Belt, which means that the proposal would constitute inappropriate development which, by definition, is harmful to the Green Belt. Consequently, very special circumstances (VSCs) must exist for the development to be considered acceptable. VSCs will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 8.8. As outlined in this Statement, the scheme involves a number of benefits and considerations which, together, amount to the required VSCs, outweighing the harm identified to the Green

Belt and other harm identified in landscape & visual terms, therefore according with local and national Green Belt policy. The facility will further increase much needed battery storage capacity within the UK and the local area, in an optimal location (directly adjacent to an existing substation with capacity to connect) to help decarbonise the energy grid, which will contribute towards meeting climate and emission reduction targets at international, national, and local levels. There is strong support for BESS facilities within recent policy statements, guidance, and research for this purpose. The National Policy Statement EN-1, which is a material consideration for this application, advises that energy storage is needed to reduce the costs of electricity and increase its reliability. As such, the proposal's ability to help the UK achieve its ambitious, yet necessary, climate goals, including net zero by 2050, and assist in ensuring local energy security, must be afforded substantial weight. As outlined, this is consistent with prevailing appeal decisions.

- 8.9. As discussed, the scheme will provide notable ecological and arboricultural enhancements including a 99% gain for hedgerow units and 15.49% gain for habitat units, which merits great weight, forming part of the VSCs. The temporary and reversible nature of the development is another element that contributes to the VSCs of the proposal, meaning that any harm on the Green Belt and landscape is entirely reversible once the facility is decommissioned after forty years. Another environmental benefit, forming part of the VSCs, includes the use of Grade 4 (poor quality) agricultural land which is not BMV (Best and Most Versatile) land. The proposal would also contribute to the rural economy and help to create an environment that welcomes inward and foreign investment, in line with the Government's ambitions. The proposal also assists with the future viability and stability of a rural farming business, through rural diversification.
- 8.10. Overall, the proposal will deliver sustainable development in a manner consistent with the Development Plan and national policy, guidance and legislation related to renewable and low carbon energy. It will make a valuable contribution at all levels – international, national, and local – to ensure the local area and wider country can fully transition to renewable sources without compromising on energy security. Taking this into account, it is therefore respectfully requested that planning permission is granted for this proposal.



APPENDIX 1: MAP SHOWING CUMULATIVE BATTERY STORAGE SCHEMES



KEY

-  Site Boundary
-  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. Application granted 27/06/2023.
-  SMD/2023/0639 - Screening request for a battery energy storage facility on land at Greenfields Farm. Awaiting decision.

NOTES:
REVISIONS:
A - (28/06/2023 AJH) revised boundary
B - (19/09/2023 EH) revised boundary
C - (21/12/2023 EH) cumulative scheme amendments
D - (22/12/2023 EH) revised boundary

CUMULATIVE BATTERY STORAGE SCHEMES

NEWFIELDS FARM

CLIENT
Newfields BESS Ltd.

DATE	SCALE	TEAM	APPROVED
22/12/2023	1:10,000@A3	EH	EB

SHEET	REVISION
-	D

DRAWING NUMBER
P23-0415_EN_01

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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