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17th May 2024

Our Reference EP-24-094

Dear Sir/ Madam,

Proposed Battery Energy Storage System (BESS) at Land Adjoining New House Farm, Luzlow, Bagnall, Stoke-On-Trent, ST9 9JZ

REQUEST FOR SCREENING OPINION UNDER TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017.

Energy Planning is retained by YLEM (BESS) South Limited ('the applicant') to request an Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 6 of the Town and County Planning (EIA) Regulations 2017 ('the Regulations') for the proposed development of a Battery Energy Storage System (BESS) at Land Adjoining New House Farm, Luzlow, Bagnall, Stoke-On-Trent, ST9 9JZ

In accordance with Regulation 6 (2) this request includes the following:

- A plan sufficient to identify the site;
- A description of the development, including in particular;
 - A description of the physical characteristics of the development and, where relevant, demolition works;
 - A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- A description of the aspects of the environment likely to be significantly affected by the development;
- To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
 - the expected residues and emissions and the production of waste, where relevant; and
 - the use of natural resources, in particular soil, land, water and biodiversity;

It is the intention that the proposed development will be submitted as a full planning application in the coming months.



Site Plan

A Location Plan of the site is provided alongside this Screening Opinion request. The total site area is approximately 1.74ha in total.

Site Location and Description

The application site is located on land to the west of Luzlow Lane, comprises agricultural land and encompasses one field, with an access track located through a neighbouring field. Little Armshead Farm is located to the south of the site with New House Farm situated to the northeast. Current access to the site is taken via a private gate located along Luzlow Lane.

The site lies within the Green Belt as per the Staffordshire Moorlands Local Plan 2014-2033 (Adopted September 2020) and is screened by vegetation and tall trees to the south and west.

The site lies within the SSSI Impact Risk Zone of Wetley Moor, approximately 75m to the south of the site. There are no heritage designations associated with the site, or the surrounding area.

There are no Public Rights of Way on or adjacent to the site. The site lies within the National Landscape Character 64 Potteries and Churnet Valley.

The site sits on Grade 4 agricultural land under Natural England's Online Provisional Agricultural Land Classification and is within Flood Zone 1 where the risk of flooding is at its lowest.

Proposed Development

The proposed development comprises of a Battery Energy Storage System (BESS) to provide energy balancing services to the National Grid. This type of facility operates by taking electricity from the Grid at times of low demand, storing it in batteries, and releasing it back to the Grid when demand is high. Energy storage facilities therefore improve the efficiency of existing energy production facilities, notably from renewables where production is intermittent and based on external conditions. BESS plants also provide key stability services to the grid network through Dynamic Frequency Response where the plant can quickly react to network conditions to manage the electricity frequency as generation and demand loads shift. The forthcoming planning application will provide full details of the proposed development.

At this stage, the site layout submitted is indicative and the equipment likely to be used within the development include the battery containers themselves, inverters/transformers, substation, switchgear, control centre, welfare cabins, CCTV, security fencing and other ancillary equipment. The proposed development will be housed within a fenced compound. It is proposed that access to the site will be improved and utilise the existing access point off Luzlow Lane. An attractive landscaping scheme will be submitted with the full planning application, with trees and hedges around the development and along the boundaries of the development to screen the site and to enhance biodiversity by a minimum of 10%. This will help to reduce the visual impact of the development and improve on-site biodiversity improvements. For security purposes, CCTV is likely to be positioned at regular intervals along the site boundary whilst the site compound would be surrounded by a security fence.



Screening Opinion

The requirement for an EIA is either mandatory (for Schedule 1 development) or conditional (Schedule 2). EIA is only necessary for Schedule 2 development if it is likely to have significant environmental effects. The National Planning Policy Guidance ('NPPG') clearly states that an EIA should not be a barrier to development and should only apply to a small proportion of projects under the Town and County Planning regime; this emphasis remains with the change in Regulations.

The development falls under Schedule 2 of the Regulations as it falls within Part 3 *Energy Industry (a) Industrial installations for the production of electricity, steam and hot water*, which includes developments which exceed 0.5 hectares in size.

Under Schedule 2 an EIA may be required if the proposal is a major development of more than local importance (i.e., it will have wide ranging environmental effects), is located within a particularly environmentally sensitive or vulnerable location or will result in unusually complex or potentially hazardous environmental effects. It is not considered that any of these factors apply in this case.

Schedule 3 of the EIA Regulations sets out the screening criteria applicable to Schedule 2 developments, drawing attention to the character and complexity of impacts resulting from the scheme as well as a range of issues relating to the sensitivity of the site. In summary, the selection criteria fall under three broad headings:

- **Characteristics of the development** – taking into account aspects such as size and emissions;
- **Location of development** – the environmental sensitivity of the areas likely to be affected, including existing land uses, and the capacity of the existing environment to 'absorb' the new development; and
- **Characteristics of the potential impacts** – with particular regard to their extent, complexity, probability, duration and frequency.

The following paragraphs provide an appraisal of the proposed development, having regard to these screening criteria. The development proposed will not, in our opinion, have any significant environmental effects linked to the site's location and environmental characteristics, or its proposed scale. Therefore, we do not consider the proposal comprises EIA development, for the reasons set out below.

Characteristics of development

1. The characteristics of development must be considered with particular regard to –

a) the size and design of the whole development;

The site comprises a total site area of 1.74ha, consisting of an undeveloped and unoccupied area of agricultural land that expands across one field, with an access track through an adjoining field. It is considered that a battery storage development of this size and in this context would not give rise to



significant environmental effects simply due to its size and given the nature of and location of the proposals.

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

It is considered that the proposed development in this location would not result in a significant cumulative impact in terms of other proposed and committed developments in the surrounding area.

The development will be contained within a parcel of land where it will be isolated and benefit from existing vegetation screening that surrounds the wider site, but also from proposed planting that will provide additional natural screening on the site, as well as enhance the local on-site biodiversity by a minimum net gain of 10%. Therefore, the proposed development will unlikely cause any substantial and adverse cumulative impact in terms of other proposed and committed developments within the wider area. The supporting documentation for the planning application where appropriate will incorporate a cumulative assessment.

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

Development of the site will, by its very nature, require the use of natural and man-made construction materials to complete the build and fit out of the scheme. It is expected that the consumption of energy, water and natural resources during the operation of the development will be limited by the use of relevant technologies, and impacts are not expected to be significant.

d) the production of waste;

Waste generation will be limited to normal construction waste during the construction phase. However, the amount of waste going to landfill will be minimised, construction materials will be used efficiently on site, and all reusable waste will be recovered, reused or recycled wherever possible.

e) pollution and nuisances;

The construction phase of development would not create unusually high levels of vehicular traffic and the operational phase would not lead to unacceptable levels of vehicular traffic given the nature of the proposed development and the existing access roads. Measures would be implemented during the construction phase in accordance with current environmental standards to prevent pollution and nuisance. Likewise, during operation transport measures would be implemented to minimise any disruption on the surrounding road network.

Overall, potential sources of pollutions and nuisance would be managed, and relevant reports would be submitted within the planning application to address the relevant issues.

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



The risk of accidents associated with the proposed development's operations will be minimal. However, robust health and safety mechanisms will be in place in line with our client's current requirements but also the health and safety standards they have to attain. This includes in relation to fire risk.

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

There is not anticipated to be any risks to human health as part of the proposed development. Any planning submission will incorporate the relevant reports to address such matters where necessary.

Location of development

2. The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to –

a) the existing and approved land use;

The proposed development will be located on an undeveloped and unoccupied area of agricultural land. The site is located in the Green Belt as per the adopted Staffordshire Moorlands Local Plan. However, given the proposed development will be contained within a parcel of land where it will be isolated from any nearby residential properties and commercial/ farming operations and benefit from existing vegetation screening that surrounds the wider site, it is considered that the sensitivity of the site would not, on its own, warrant the requirement of an EIA. No significant environmental effects are anticipated, and any impacts can be fully investigated through the assessments listed below. Furthermore, lighting and noise impacts of the proposal will be assessed as part of the planning submission with suitable mitigation provided where necessary.

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

The proposed development is not considered to have the potential for significant impacts on the existing land use and as stated above it is not considered that the sensitivity of the site would warrant the requirement of an EIA.

c) the absorption capacity of the natural environment, paying particular attention to the following areas:-

(ii) coastal zones and the marine environment;

(iii) mountain and forest areas;

(iv) nature reserves and parks;

(v) European sites and other areas classified or protected under national legislation;

(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;

(vii) densely populated areas;

(viii) landscapes and sites of historical, cultural or archaeological significance



Based on the assessments to be undertaken as listed above, no significant environmental effects are anticipated, and any impacts can be fully investigated through the aforementioned assessment. As stated earlier in this letter, a comprehensive landscaping scheme would accompany any formal application to ensure that the scheme integrates fully into the natural environment.

The following topic areas would also be addressed as part of the full planning application submission:

Ecology and Biodiversity: The existing agricultural site is considered to have some degree of potential in terms of biodiversity. No significant environmental effects are anticipated with regards to biodiversity given the characteristics of the site, its location and the nature of the development. Any forthcoming planning application would be accompanied by an ecological appraisal of the site and plans for biodiversity enhancement to ensure a minimum of 10% net gain is achieved.

Flood Risk Assessment: The site is located within Flood Zone 1. A Flood Risk Assessment and Drainage Strategy will be provided as part of any planning submission. No significant environmental effects are anticipated with regards to flooding as a result of the proposed development.

Historic Environment: There are no listed buildings or other historical designations associated with the site. Although no significant environmental effects are anticipated regarding heritage considerations, a Heritage Assessment will be submitted as part of the subsequent Full Planning Application.

Landscape and Visual: The site is located within the Green Belt and will be on a piece of vacant land that is partially screened by vegetation and tall trees that surround the periphery of the wider site, limiting visual impacts to any nearby dwellings and those travelling along Luzlow Lane. A landscape and visual appraisal would be submitted to assess these matters further.

Noise: It is anticipated that the proposed development would not give rise to any significant environmental effects by virtue of noise. A noise assessment will be submitted to support the subsequent planning application.

Transport: It is not anticipated that there would be significant effects on the wider highway network. Furthermore, the planning submission will be supported by the necessary Transport Assessment including mitigation measures where appropriate.

Characteristics of the potential impact

The potential significant effects of development must be considered in relation to criteria set out under paragraphs 1 and 2 of Schedule 3 of the EIA Regulations (discussed above), and having regard in particular to -

- a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- b) the nature of the impact;
- c) the transboundary nature of the impact;



- d) the intensity and complexity of the impact;
- e) the probability of the impact;
- f) the expected onset, duration, frequency and reversibility of the impact;
- g) the cumulation of the impact with the impact of other existing and/or approved development;
- h) the possibility of effectively reducing the impact.

It is considered that the extent of any impacts would be localised and non-complex. Some effects would be temporary during the construction period, whilst other effects, although permanent for the lifetime (approximately forty years) of the development, are not considered to be significant.

In summary, for the reasons stated above it is considered that the proposed development will not result in significant effects on the environment. There do not appear to be any overwhelming reasons evident that would determine in this instance why an EIA would be required. We therefore request a formal screening opinion under Regulation 6 of the EIA Regulations as to whether the local planning authority agree that an EIA is not necessary in this case.

If you require any further information, please do not hesitate to contact me.

Yours faithfully,

Sharon Thomas
Senior Planner
Energy Planning