

19/11/2024

Louise Leyland
PWA Planning
2 Lockside Office Park
Lockside Road
Preston
PR2 2YS

Dear Miss Leyland

Town and Country Planning (Environmental Impact Assessment) Regulations
2017 (as amended)
Scoping Opinion with regard to Proposed Battery Energy Storage System at Land
Adjoining New House Farm, Luzlow Lane, Bagnall, Staffordshire ST9 9JZ

I refer you to the above matter with respect to the request for a Scoping Opinion from Staffordshire Moorlands District Council submitted pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regs).

The following documentation was submitted with the request:-

Scoping Report dated September 2024
Location Plan (Ref: LZL-BESS-001.4)
Layout Plan (Ref: LZL-BESS-001.5)

The proposed development

The applicant, Root Power (South) Limited, propose to submit full planning application for the installation of a 99MW Battery Energy Storage System on a 2.02ha parcel of land at land adjoining New House Farm, Luzlow Lane, Bagnall. Paragraphs 1.9 to 1.15 of the Scoping Report provide greater detail of the development proposed.

Aspects of the environment likely to be significantly affected (the Scoping Opinion)

The following sets out the Scoping Opinion in relation to the 'Scoping Report' and the observations of the various statutory and non-statutory consultees.

The matters to be assessed in the Environmental Statement (the ES) as set out in paragraph 5.6 of the Scoping Report are accepted and agreed. These relate to the consideration of:

- the Landscape and Visual effects – as detailed in paragraphs 3.4 to 3.34 of the Scoping Report.
- the Traffic and Transport effects – as detailed in paragraphs 3.35 to 3.53 of the Scoping Report

The structure of the ES, as detailed in Section 5 of the Scoping Report is accepted and agreed. The ES should include information set out in Schedule 4 (Information to be included in Environmental Statements) of the EIA Regs.

We have the following additional comments:

Matters to be scoped in

Landscape and Visual Impact

- Consideration should be given to the potential after dark effects of the introduction of any lighting into the currently undeveloped site on the landscape character and visual baseline
- In addition to users of PRow's and roads etc. any residents of houses in the vicinity of the proposed development need to be considered as sensitive visual receptors when assessing the visual impact of the proposed development
- The effect on tranquillity should also be considered
- The cumulative impact of other similar schemes in the local area should be taken into consideration and should take into account both the construction and operation phases of the development. The assessment should also include the assessment of the potential sequential cumulative effects that may arise. We note the intention that this would not be a dedicated chapter.

In terms of other similar developments in the area, these are:

Land Adjacent to Cellarhead Substation

SMD/2022/0548 – Erection and operation of a Battery Energy Storage System and associated infrastructure and equipment – Approved – 27/06/2023

Land East of Cellarhead Substation, and West of Rownall Road, Wetley Rocks, Staffordshire

SMD/2022/0444 – Erection of a Flexible Energy Facility – Approved – 22/12/22

Land Adjacent to Armshead Farm, Armshead Road

SMD/2022/0574 – Erection of storage containers, support infrastructure and security fencing for battery energy storage facility along with landscaping and all associated works – Refused – 26/06/2023. APPEAL ALLOWED – 23/09/24.

Land at Newfields Farm, Rownall Road, Wetley Rocks, Staffordshire, ST9 0BS

SMD/2024/0019 - 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 – Refused – 27/09/24 – Appeal Likely

Land South of Cellarhead Substation and West of Rownall Road

SMD/2024/0055 - Erection of a Flexible Energy Facility, associated works, landscaping and habitat creation – Under Consideration

Land At Rownall Farm, Rownall Road, Wetley Rocks

SMD/2023/0523 - Installation of a solar farm comprising ground mounted solar PV panels with a generating capacity of up to 49.99MW including mounting system, underground cabling, stock proof fence, CCTV, internal tracks and associated infrastructure, landscaping, biodiversity net gain and environmental enhancements for a temporary period of 40 years – Under Consideration

Natural England have also provided some general advice on Landscape and Visual impacts. Please see their comments in Annex A:

[AttachmentShowServlet](#)

Traffic and Transport

Staffordshire County Council Highways have advised the following:

I note there is reference to a Transport Statement and CTMP to accompany a future application. These should include:

*Duration of construction works;
Intensity of construction works – vehicles per day....;
Types and sizes of delivery vehicles;
Numbers of delivery vehicles;
Approach routes for deliveries;
Timing of deliveries to avoid peak hour;*

Consideration of the effect of large delivery vehicles on relatively narrow lanes and proposals to safeguard or repair damage to carriageway, edge and verge; Can large HGVs and specialist haulage vehicles negotiate the access route? Auto tracking will be required of the largest vehicles.

*Proposals for access – widening, hard surfacing, visibility splay;
Details of visits required for ongoing operations and maintenance;
Proposals for wheelwash and road sweeper;
Other developments in the area and potential cumulative effect and how this would be prevented/mitigated.*

This is the latest in a series of this type of application in this immediate area. Some of these have planning approval but do not appear to have started. The potential cumulative effect of these developments commencing at the same time or overlapping is becoming a concern. I note the developer is not intending to 'dedicate a chapter' to cumulative effects. It may be appropriate for this to be reconsidered? Developer does appear to have been made aware of the other developments and a potential cumulative impact should be addressed.

We note the intention at 5.53 of the Scoping Report that cumulative effects would not be covered by a dedicated chapter. We wish the ES to be consider the cumulative effects with those other developments detailed above (in the Landscape and Visual section). This need not be a dedicated chapter although the consideration of the cumulative effects would be necessary within the Traffic and Transport section of the ES.

Matters to be scoped out

Noise – This matter can be dealt with separately. Any application would need to be supported by an appropriate noise survey/impact assessment. Consideration should be had to whether there is any potential for cumulative effects

Air Quality - This matter can be dealt with separately covered by the planning statement and/or air quality assessment.

Designated and Non-Designated Heritage Assets (including Archaeology) – This matter can be dealt with separately. Any application would need to be supported by an appropriate heritage statement, geophysical survey and trial trench evaluation as confirmed by the Scoping Report.

Ecology - This matter can be dealt with separately. Any application would need to be supported by an appropriate Preliminary Ecological Appraisal, any surveys identified as necessary, to demonstrate the effect on protected species and their habitats. The application should provide information to demonstrate that a Biodiversity Net Gain will be delivered, supported by the most up to date BNG Metric.

The submission relating to ecology should assess any likely effects on priority habitats on site and nearby sites, including the nearby Wetley Moor SSSI.

Hydrology/Flood Risk - This matter can be dealt with separately. Any application would need to be supported by an appropriate Flood Risk Assessment and Drainage Strategy. Any drainage strategy should include measures required by Staffordshire Fire and Rescue. Consideration should also be had to the effect on nearby watercourses/sites.

Trees/Hedgerows - This matter can be dealt with separately. Any application would need to be supported by an appropriate tree survey/arboricultural impact assessment.

Fire Safety/Accident Risks - This matter can be dealt with separately. Any application would need to be supported by an outline fire safety strategy to demonstrate adherence to the latest guidance. You are advised to make contact with Staffordshire Fire and Rescue at an early stage to discuss the proposals.

Best and Most Versatile Land - This matter can be dealt with separately. Any application would need to be supported by an Agricultural Land Classification assessment.

Consultation Comments

The Council has received consultation comments from:

Natural England
Environment Agency
Staffordshire Wildlife Trust
Staffordshire County Council Highways

Their comments can be found at:

[Planning Application - Staffordshire Moorlands District Council](#)

The applicant is encouraged to read and consider comments received from all consultees which are available on the Council website and include helpful advice.

You will also note that there have been a significant number of representations raised by local residents to the scoping opinion.

Conclusions

We trust the above clearly sets out the Scoping Opinion of Staffordshire Moorlands District Council. Please be advised that the scope of the EIA will need to be kept under review and modified, for example, if there is a material change in the project or baseline conditions, if new information comes to light and/or new environmental impacts are identified that have the potential to be significant.

However, should there be any matters arising, please do not hesitate to contact us.

Yours sincerely,

X 

Signed by: Jane Curley

On Behalf of Staffordshire Moorlands District Council