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10th September 2022

Staffordshire Moorlands District Council
The Planning Department
Moorlands House
Stockwell Street
Leek
ST13 6HQ

For the attention of Ms Jane Curley

Planning application SMD/2022/0076 – Construction of a temporary Battery Energy Storage System on land off Bemersley Road, Ball Green, Stoke on Trent

I feel that Anesco have failed to ascertain the character and importance of this site and the passion residents have towards our Green Belt when proposing this application. Consequently, I feel they have prolonged this process by continually drip-feeding information to the Council in attempting to support the development on Green Belt.

I would therefore like to formally add further objections about this planning application in response to the latest information shared by Anesco as follows:

Construction Traffic Management Plan

Anesco's documents dated 10th June 2022, state the development will be sited on undeveloped agricultural land, in fact designated Green Belt, and that they will reduce the risk of mud on to the highway. It does not confirm how they will eliminate mud from the highway, which of course would cause dangerous driving conditions. This needs to be satisfactorily mitigated, with the use of road sweepers at the applicant's own cost.

They state construction will only take place Monday – Friday between 8.00am and 6.00pm and on Saturdays from 8:00am until 2.00pm. They quote 774 two way journey, which they fail to recognise is via very narrow and winding lanes in parts, where it can be difficult for 2 cars to pass one another; they will be driving past a primary school which is situated on the road itself with the associated congestion of the school traffic, but worse hundreds of children having to negotiate narrow pavements on their way to and from school; they will drive through a small village where the main shops, chemist and doctors are directly on the road, with an ageing population accessing them; and they will pass by a children's playground. If this is not intrusive enough on our quiet villages, they add that "dependent on weather conditions or unless otherwise specified in writing by the local planning authority" these hours may change. This is unacceptable, dangerous and the timings are open to misuse.

They state they will use a "just in time" approach whereby drivers will have to pull up and call the site for permission to unload. Again, they fail to demonstrate or have any awareness of the route they are proposing, and would suggest they have yet again failed to even see the site and its access for themselves. The route they propose to the site consists of the A53, a main arterial route in the

city with nowhere to pull over without causing significant disruption and congestion. Then they would proceed along Norton lane, a narrow winding lane, where it is impossible in places to for a car to pass a public bus, and there is already congestion at key times; they would proceed via the village of Norton, where the pavements are extremely narrow in parts; and then proceed via the village of Ball Green. The route DOES NOT allow for articulated vehicles to simply pull up. The only widening of the road on the entire route is directly adjacent to a children's play area!

The document states that Norton Lane and Bemersley Road will be used by laden vehicles of 28.2 tonnes and unladen vehicles of 11.2 tonnes and yet the weight limit for both, which is clearly signed is for 7.5 tonnes. They also suggest they will have 774 two-way movements during construction. This is significant in terms of usage, with weight limits clearly in place for a purpose. I would be interested to hear what Stoke on Trent City Council and its local Elected Members think about such usage and assume they are being specifically consulted with on this item?

The document yet again displays Anesco's blatant disregard for accuracy, demonstrated in their previous documents, not just for this planning application but others around the country. They state that Bemersley Road has a maximum speed limit of 40 miles per hour, with no street lighting. It is a ludicrous statement with not only signage stating that the legal limit is 30 miles per hour, but it is also fully lit with street lights set at less than 200 yards, clearly demonstrating a 30 mile per hour limit. Yet again not only are their facts twisted but they have no regard for the community or residents in terms of their application as they have failed to even notice what is legal i.e. speed limits, and the use of street lighting to demonstrate speed limits.

Visual Impact on the Green Belt - proposal of an Acoustic Fence

The latest modelling by BWB, submitted on behalf of Anesco is now attempting to suggest there will be no noise impact on those in proximity to the site during the day and little impact at night. However, they are now relying on the installation of a 1.5-metre-high acoustic fence to do this.

An acoustic fence by its very nature is of solid construction, therefore to propose a solid "wall" like structure in the middle of the open green belt is beyond ridiculous. The visual impact of the BESS would be bad enough but to then have it surrounded by a solid 1.5m high barrier in the middle of open green belt which can be viewed from miles around is ludicrous. This is a visually intrusive impact on our Green Belt.

The maintenance of such a fence over a 40-year period cannot be assured either; nor are we guaranteed of any replacement during this life cycle. The more that is installed also has more of an impact when it comes to decommissioning and disposal.

Noise Assessment

Ironically the BWB assessment tries to rely on Clause 11 of the BS 4142 to demonstrate how the impact on my home, my bedrooms, and my legal right to peace, quiet and enjoyment of my home is a viable excuse to adjust and reduce their noise assessment! However, the Human Rights Act, Protocol 1, Article 1 (not affected by Brexit) gives me the right to have the peaceful enjoyment of my possessions, (which includes my garden) not just during the day but at night as well. It is convenient that the noise assessment modelling tool, completed by the proposer themselves, is suggesting that the impact of noise is now low. The example quoted by BWB to mitigate reductions in their calculation states:

"The context is a new item of plant at a commercial-premises with other plant elsewhere in a residual acoustic environment that, whilst relatively steady, includes regular events of a significantly higher level than that from the plant. At these times the noise-sensitive location is indoors with open windows where residual sound within the dwelling will further mask

sound from the plant. Logarithmically subtracting residual level of 28 dBA from ambient of 36 dBA indicates source produces 35 dBA. BS 8233 indicates that 35 dBA sound level from the plant, equating to an internal level of around 25dBA or lower, with no significant acoustically distinguishing characteristics is suitable for a bedroom,”

This bears no comparison to this BESS proposal. The BESS will be positioned in an area with extremely low-level sound as it is rarely used for anything other than the grazing of cows; there are no other commercial premises in its proximity; nor are there many domestic dwellings nearby; and there is just one road, with low usage and a 30 miles per hour speed limit. As a result, the LA90 (our background noise levels) are consistently low and are not exceeded by severe increases. What is not taken into consideration is wind direction and because of the openness and shape of the valley the way that sound is already carried for instance when the farmer is collecting silage in that field.

It is also objectionable for them to propose that noise levels at night will be masked by being indoors with partially opened windows. It does not consider noise levels when those with a disability need to rest; does not consider shift patterns for work; nor does it consider the sleeping habits of younger children. This is a breach of our human rights.

I also note that their modelling does not account for tonality, impulsivity nor intermittency of the noise from the BESS.

Very Special Circumstances

It is considered that the irreversible damage to the local community in terms of visual, audible and general intrusion to the Green Belt are not outweighed by the minor contribution the BESS will provide to the wider community. It will not have any local economic benefit as Anesco intend to monitor the site remotely with no local maintenance on site.

The installation of an ugly development of this nature and size will be detrimental to the character of the area for years to come. The development cannot be considered as a temporary structure and it is too far into the future to determine what will happen in 2063, when some of us will no longer be here. Their own response to decommissioning is so ridiculously light with just 231 words describing its removal, against thousands of words trying to excuse its build, that it is clear they too have no concept of what decommissioning will really mean.

Finally, the very special circumstances as required by the National Planning Policy Framework (NPPF) paragraph 147 for the development in the Green Belt ARE NOT MET by this application. There are no special circumstances to excuse the violation of Green Belt. The special circumstances outlined by the NPPF cannot be used when there is already an application to construct a BESS on a Brown field site just 850 meters away!

I therefore once again formally object to this application.

Yours sincerely

Mrs T Kirton