

I attach not only the below comments but 3 previously submitted objection letters to this proposal.

Due to the need to submit only through the Planning Inspectorate portal I have been asked to submit a collective objection letter on behalf of residents living in Heather View who are directly impacted by this proposal due to our close proximity to the site, who feel that they are disadvantaged by the process involved in responding. They are not IT literate; feel under pressure due to the timing; and have protected characteristics as defined by the Equalities Act.

I therefore provide our collective objections.

Location/Impact on Landscape Character

We should **not be expected to be surrounded** by the development of **two Battery Energy Storage Systems in one village**.

- There is already a Battery Energy Storage System approved by Stoke on Trent City Council. Planning permission has already been granted for this, which is on a Brownfield site just 850 metres away from this proposed site, which Anesco seem to want to ignore.
- Anesco clearly state that there is no policy or legislative requirement to consider alternative sites but try to warrant this particular site as they claim there is no other alternative.
- They claim there are no suitable or available non-Green Belt sites which could accommodate the proposed development. This is categorically incorrect and extremely misleading. This is a statement aimed at Staffordshire Moorlands Council, however within the actual locality of this proposal there is Brownfield sites. These however fall within the remit of Stoke on Trent city Council and so this is semantics around the boundary.
- Later in the report Anesco claim that the current Labour Government are proposing to amend the National Planning Policy Framework and try to add weight to their argument using this “potential change in their favour. Using the same “potential change” the same Government are alleged to be considering boundary changes which would see Staffordshire Moorlands District Council subsumed by the larger Unitary Authority of Stoke on Trent. If this was to happen then of course Stoke would not approve 2 sites in the same vicinity!
- The approved BESS which falls within Stoke on Trent City council boundary is on the other side of Bemersley Road. It is on Brownfield in an area that already has approval for solar panels and is accessed via a dual carriageway, which has a direct transport network to the M6 motorway.
- The approved BESS site in Stoke on Trent is also within close proximity of a Fire Station, whereby Fire Engines can access the site via a dual carriageway and wide single carriageway, rather than via narrow winding lanes.
- The Anesco proposed development would also need to connect into the grid at the same point that the approved BESS!
- The site is of significant value with the valley being home to various animals, flora and fauna.
- Rotating and moving the proposed units nearer to the Western boundary allegedly to ensure it is less visible from the Easter boundary will NOT stop the site from being seen, and simply moves it closer to those living on Bemersley Road.
- It is still FALSE to say it will be unseen as planting will take 15 years to grow before it shields anything. Their own assessment still clearly states that the impact will be “moderately ADVERSE” reducing to “minor adverse” AFTER 15 years.

Effects on Residential Amenity

The latest assessment still tries to rely on Clause 11 of the BS 4142 to demonstrate how the impact on our homes, our bedrooms, and our legal right to peace, quiet and enjoyment of our homes 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 us the right to have the peaceful enjoyment of our possessions, (which includes our 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.

- Anesco's own noise assessment states that any impacts will be "localised in nature and in the worst-case scenario limited despite the size of the development" – this demonstrates absolute disregard for us as local residents living in a rural environment where population levels are less.
- It suggests that because the noise will only impact a few it outweighs the benefits. This is very "David and Goliath" suggesting that a small number of residents, that also happen to be Stoke on Trent residents and not Staffordshire Moorlands can be ignored!
- The latest noise assessment still says that those living in close proximity will be subject to INCREASED noise levels – this is wholly inappropriate to any residential development and is extremely concerning for those of us who live in Heather View, marked as Noise Sensitive Receptor 2.
 - a. By way of interpretation Anesco suggest from Figure 4.1 of their Noise Assessment Report that the position of NSR2 would give a day reading of 35, whereas the actual predicted sound contour of that diagram clearly shows it to be in the 35-39 contour and in extremely close proximity to the 40-45 sound contour.
 - b. The figure from 4.2 shows the contour to be at least in the 35-39 area.
 - c. They then use the figures of 35 during the day for their table at 4.4 and 36 for the night. This is extremely misleading and for a reader to pick this out of thousands of words submitted in their numerous documents appears to be yet another way of hiding the actual facts.
 - d. When using the lower figures from their report and not the actual contour diagram they report a zero impact during the day, claiming this to be low, when in fact the upper figure from their contour diagram is at least 39 and bordering with 40-45. Remembering this is only modelling and most would utilise the worst-case scenario rather than to twist the data to suit! With a level of 40-45 this would have a significant day time impact on residents of Heather View.
 - e. When looking at nighttime impact Anesco use the figure of 36 stating a difference of +14 and a high impact (they later argue this back down). However, the figure of 36 is within a bandwidth of 35-39, so again using the upper figure of 39 the impact would read as +17.
- Following complaints around visual amenity from the Staffordshire Moorlands residents Anesco are now trying to drop any acoustic barrier. We feel this is to appease the Inspectorate in terms of visual amenity impact and yet this then has a negative impact on Stoke on Trent residents who will suffer more noise.

Planning Policy - Developing the Green Belt

- This is an inappropriate development of designated Green Belt which is shared with the city of Stoke on Trent. Anesco themselves state "It will result in a change to the visual openness of the Site" and yet they try to excuse this by talking about changes to the National Planning Policy Framework.
- To be very clear the very special circumstances required by the National Planning Policy Framework are not met as the NPPF has NOT been amended, and it is only SUGGESTED that it COULD be.

Anesco are trying to use a potential change to add weight to their argument, but they submitted this application in December 2021, had it rejected in June 2024 and are appealing in the hear and now. They cannot rely on future potential legislation for their arguments, where there is no timeline even for its potential implementation.

- Development of this type and magnitude is not consistent with local planning frameworks. And as quoted earlier if we are to believe all potential changes being discussed by the current Government Staffordshire Moorlands District Council will not exist and will be subsumed into Stoke on Trent City Councils local planning framework!
- The removal of our hedgerows is an unacceptable loss, and against SMDC policy. Stating that replanting them will be a long-term benefit to residents is a ridiculous and non sensical statement. These hedgerows have been there for hundred of years. Replacing will take at least 15 years for them to become anything like an established hedgerow and yet the site itself is only meant to last 40 years in total! This means it will take almost 40% of the time limited development to get them anywhere back to how they look now – this is not beneficial to residents. It is detrimental to our countryside and our wildlife.

Fire Safety

- Battery storage units and related equipment are well documented to be a fire hazard. Even Anesco in their report talk of battery development becoming safer since their application.
- Incidents of serious fire and explosions, which release toxic gases, at other battery storage units suggest that there is a danger to the public. Where these have occurred, residents have been warned to remain indoors with doors and windows shut!
- This site is within proximity of two primary schools and a highly populated residential area.
- The Fire Safety report clearly states that a fire would be left to burn out as it cannot be extinguished. This reiterates that those in close proximity would clearly be affected.
- The Fire Safety report states there will be “pull in bays” for Fire Engines. These are not at all clear on any diagram within the report. Of concern is that the writer of these reports clearly hasn’t visited the actual site as the only access to this site is on a BLIND bend of a narrow county lane. Cars have to stop to let each other pass, the land itself is prone to flooding and is often impassible.
- Any fire would cause irreparable damage and pollution to the River Trent and Cauldon Canal because of the debris from smoke and ash that would emanate from the site. It is not just water egress that can cause damage.

Additional comments

- The storage of electricity is NOT increasing the production of energy from renewable sources, it simply allows those who own the BESS to profit from the resale of stored electricity which is sold at peak times at increased costs.
- Travel to and from the site during 36 weeks of construction will increase the risk of accident in the area.
- Our village is made up of many narrow lanes, with little or no pedestrian footpaths. Anesco say up 5 lorries per day, but this is then 10 articulated lorry journeys. Most of the roads in our area are weight restricted for a reason and yet Anesco are planning to transport materials via Norton Lane, past a school, through the village of Norton and the village of Ball Green, passing over speed humps and using lanes with speed restrictions on them because of the danger to road users and pedestrians.

This forum was established following the ill-conceived idea to propose a BESS between the residential villages of Ball Green and Brown Edge. Almost 300 households are members of the forum and have clearly stated in their comments to Staffordshire Moorlands that they do not agree with this proposal. This is a prepared statement from the Group:

“Both Ball Green and Brown Edge are small community villages. We fall under different Local Authorities separated by a large expanse of Green Belt.

When Anesco first dreamt up this ridiculous proposal just over 2 years ago, very few of us had received any kind of communication from them. They posted a limited number of leaflets and claimed they had little objection to proceed.

Residents wanted to know more and so our discussion group was formed. Almost 300 individuals joined to understand the impact this would have on our lives, our surroundings and our villages.

It soon became clear that a strength of opposition to this proposal existed. Here is a summary of our collective views:

This is inappropriate development of designated Green Belt.

- The National Planning Policy Framework clearly states, “The fundamental aims of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.
- Development of this type and magnitude in our rural villages is not consistent with local planning frameworks and will cause irrecoverable harm by allowing the merger of the outlying villages of Ball Green and Brown Edge – this is urban sprawl and cannot be excused as “temporary construction” when the proposal is for 40 years.
- The very special circumstances as required by the NPPF for the development in the Green Belt are not met by this application.

It is clear the proposal will emit a noise which is not characteristic for the area.

- It would position loud industrial plant in agricultural fields adjacent to residential areas.
- Noise Assessments predict the noise environment for a significant number of residents will increase.
- Noise from the site will be heard in residential gardens.
- Night-time noise levels will rise significantly.

There would be a huge impact on our community during its construction.

- Bemersley Road is a minor, narrow road with a weight restriction on vehicles.
- There are hedges along the carriageway, with no verges or pavements, and so the creation of a new wide verge would be completely out of character.
- Having an additional 4 or 5 HGV's using this road every day during the construction phase would have a severe impact, increasing possible vehicle accidents and noise disruption.
- It is already difficult in parts to pass ongoing traffic and so this number of lorries everyday would cause additional disruption.
- The road serves the main village shops, children's park and doctor's surgery so there is an increased risk to pedestrians in the village.

- This site is ½ mile from the nearest substation so will require a considerable amount of additional construction to connect it.

We accept facilities of this nature are needed but these must be on brownfield sites in industrial complexes.

We also feel there remains many risks of having a BESS on our doorstep. There are too many reported incidents of battery fires, and insufficient weight has been given to addressing this risk during the 2 years it has taken for this application to come before this committee.

In summary residents of both Ball Green and Brown Edge strongly object to this proposal and respectfully ask that you support us by rejecting this application.”

We the residents of Heather View are appalled that Anesco are appealing this planning application, especially given the wholly misleading and slanted version of their justifications. We look forward to speaking directly to the Planning Inspectorate at a future hearing.