

CPRE response to Staffordshire Moorlands District Council (SMDC) on planning applications of multiple energy facilities near the National Grid Cellarhead Substation

Subject Applications:

[SMD/2024/0423](#) Battery Energy Storage System and substation with associated infrastructure and works

[SMD/2024/0556](#) 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.

Site Location: Land South of National Grid Cellarhead Substation, Rownall Road, Wetley Rocks, Staffordshire, ST9 0BS

Scope of the Response:

This response aims to recommend a Planning Permission Refusal to the Staffordshire Moorlands District Council (SMDC) regarding multiple planning applications for Battery Energy Storage Systems (BESS) situated near the National Grid Cellarhead Substation. CPRE acknowledges the critical role of the UK government's Net Zero Strategy and the significance of renewable/low-carbon energy, as emphasized in the National Planning Policy Framework (NPPF) and the adopted Staffordshire Moorlands Local Plan, which supports the development of energy storage facilities. However, the cumulative impact of these proposed developments, in conjunction with the existing National Grid Cellarhead Substation and the recent planning permission approval of adjacent sites, poses a detriment to the rural landscape, biodiversity, and health risks of nearby residents.

1. Landscape and Characteristics

- 1.1. The Landscape Character Assessment of Staffordshire Moorlands designates this area as the Ancient Plateau Farmlands, characterised by heathland, gentle undulating landforms and steep slopes. The Planning for Landscape Change Supplementary Planning Guidance to Staffordshire and Stoke on Trent Structure Plan identified this landscape character area as one in decline that requiring restoration. The introduction of further incongruous landscape features, including energy storage systems, will cause the loss of the landscape elements that contribute to the Ancient Plateau Farmlands distinctiveness and cause unacceptable visual harm.
- 1.2. The subject site is located within the Green Belt, for which NPPF paragraph 142 emphasises the importance of keeping land permanently open. The NPPF established that the Green Belt's role in safeguarding the countryside from encroachment. Given the presence of the existing National Grid Cellarhead Substation and the recently approved flexible energy facility, SMD/2024/0055, we urge SMDC to carefully evaluate the adverse impacts of these applications on the openness of the Green Belt.

- 1.3. The Landscape Character Assessment for the Staffordshire Moorlands highlights key issues affecting the Ancient Plateau Farmlands, including the impact of the urban fringe and the increase of incongruous features such as powerlines and electricity substations. This has resulted in loss of vegetation and deterioration of remaining natural features. The applications fail to adequately consider their direct and indirect impacts, as well as their scale within the context of the wider landscape. Concerns regarding the cumulative impact of similar developments in the area and the landscape industrialisation would significantly harm the visual amenity of the countryside, thereby contradicting Policies SS1, SS10, SD2 of the Staffordshire Moorlands Local Plan.
- 1.4. In the proximity of the subject sites, multiple proposed developments of energy facilities have been submitted to SMDC. Two of these applications have been granted planning permission. Notably, application SMD/2024/0019 was initially refused by SMDC due to concerns outlined in the decision notice: harm to the Green Belt, cumulative impacts of industrial development on the landscape and visual amenities, and an increased risk of fire and health issues in the local area, specifically the nearby Newfields Farmhouse. Despite exhibiting similar potentially harmful features, SMDC recently granted planning permission for application SMD/2024/0055.
- 1.5. Relevant Planning history:
- [SMD/2024/0019](#) – Land at Newfields Farm, Rownall Road, Wetley Rocks, Staffordshire, 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 – Planning Permission Refused
- [SMD/2023/0523](#) – Land at Rownall Farm, Rownall Road, Wetley Rocks, Staffordshire, 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 – Awaiting Decision
- [SMD/2024/0055](#) – Land South of Cellarhead Substation, and West of Rownall Road, Wetley Rocks, Staffordshire, Erection of a Flexible Energy Facility, associated works, landscaping and habitat creation – Planning Permission Approved
- [SMD/2022/0444](#) – Land East of Cellarhead Substation, and West of Rownall Road, Wetley Rocks, Staffordshire, Erection of a Flexible Energy Facility – Planning Permission Approved

2. Traffic, Health and Safety

- 2.1. The subject sites directly impact public rights of way running along the access area and adjacent to the site boundary. Specifically, the applications fail to adequately consider their potential impact on Public Footpaths No. 60, No. 48 and No. 58 within Cheddleton Parish and Public Footpath No. 35 within Bagnall Parish. As the public footpath network is essential for sustainable transportation, it must be carefully planned for and clearly shown on planning applications to ensure the avoidance of obstruction during construction and post-development phases.

- 2.2. The operation of BESS inevitably generates a constant, low-level humming noise that can be perceived as intrusive. The proximity of the proposed systems to residential farms will potentially impact the health and well-being of residents. While SMD/2024/0556 includes a legal agreement stipulating that the property at Newfields Farm will not be occupied during BESS operation, the cumulative noise generated by both subject sites will likely affect other residents living in the vicinity.
- 2.3. Traffic safety is a significant concern, particularly for SMD/2024/0556, as it proposes only one access point to the site via a private access on Rownall Road. The anticipated movement of a substantial number of HGVs during the construction phase raises concerns about the potential for personal injury accidents (PIAs). Notably, SMD/2024/0556 supplement document mentioned a PIA happened between a car and an HGV at the junction of the private access, on Rownall Road and Mill Lane. Furthermore, the limited access point could also hinder emergency vehicle access, particularly for fire services, in the post-development phase.

3. Biodiversity

- 3.1. The subject sites consist of hedgerows and trees, some of which are classified as Grade A and B. There is significant concern that the proposed design, demolition, and construction activities will directly impact the habitat of these trees.
- 3.2. Located approximately 1 mile to the Southwest of the subject sites is the Wetley Moor Site of Special Scientific Interest (SSSI). As the subject applications fall within the Impact Risk Zones for this SSSI, it is imperative to consult with Natural England to assess the potential impacts of the proposed developments on the SSSI.
- 3.3. This area is designated as an Upland Breeding Bird Area and is covered by the Priority Species for Countryside Stewardship, specifically targeting Curlew and Lapwing. The construction of BESS within this area has the potential to significantly disrupt the breeding habitats of these important bird species.
- 3.4. Biodiversity Designation:
 - Site of Special Scientific Interest (SSSI) Wetley Moor nearby and within its impacted zone.
 - Priority Species for Countryside Stewardship targeting Curlew and Lapwing.
 - Upland Breeding Bird Areas for Countryside Stewardship.
 - Woodland Priority Habitat Network (Partially in High Priority)
 - Priority Habitat Inventory – Deciduous Woodland

4. Recommendation

- 4.1. We recommend a Refusal of Planning Permission for the subject applications due to the cumulative harmful impacts within this area. CPRE recognises the importance of low-carbon energy solution and the government's Net Zero strategies in promoting sustainable development. However, we strongly urge SMDC to carefully consider and evaluate the significant consequences of releasing Green Belt land for development and the cumulative

harmful effects on the landscape character, human health, safety, and biodiversity within this area.