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To: Planning Comments (SMDC)
Subject: Comment Received from Public Access

Categories:

Application Reference No. : SMD/2024/0568 Site Address: New House Farm Luzlow Lane Bagnall Staffordshire ST9
9JZ Stoke-On-Trent Comments by: Lisa Jarvest
From:

Submission: Objection
Comments: Reasons for objection:

1. Water contamination risk

There is no consideration of the local residents' and farmers' water supply and the risk posed by this development. Little Armshead's ONLY drinking water supply is provided by bore hole. Should there be a fire or any other incident there is a very high chance that there would be contamination by 'forever chemicals' and battery pollutants which would get into the ground water and aquifer. The bore hole at Little Armshead Farm is 66m deep and only about 100m from the proposed site. The survey presented by the applicant confirms there is no flood risk due to the permeable nature of the bedrock. This also means there is nothing to protect the deep ground water from pollution from above.

New House Farm which is also adjacent to the batteries is also at risk as it has bore hole water supply (2 bore holes one circa 30m and the other circa 70m deep)

There are several old wells (at least 5 within 200m) in the surrounding properties, some of which are used as livestock drinking water. Little Armshead farm's well is currently used to provide water for pigs and sheep.

2. Proximity to residents

The owners of Little Armshead Farm are only within 80m of the proposed development and are at significant risk if there was a fire due to toxic fumes and smoke, plus associated contaminated dust, which would contain highly dangerous chemicals derived from the lithium. There are now multiple examples of this risk evidence coming out, eg from particularly America where there is more experience.

3. Fire management

There is only one entrance and exit to the site, and on speaking to fire officers and fire experts, the brigade would not allow its personnel into the battery enclosure as there would be a risk of losing their exit. A fire would be left to burn out as is evidenced by other fire incidents in multiple places around the world.

There is also relatively poor access for the fire services and they are based fairly distant, so if a thermal runaway occurred the response time could easily prove a problem.

4. Light pollution

The site if lit even with LED lighting would have a detrimental effect on wildlife, and the environmental reports I genuinely believe are flawed. Evidence from peer-reviewed scientific papers (to be provided) show that lighting would be detrimental to many species, and can interfere with insect, bird and mammal life cycles, and light and darkness are biological triggers.

Lights at night also will scare many species away from the area, especially the local barn owls who breed (and have done for over 10 years), and bats which range over this and surrounding fields

The owners of Little Armshead Farm have their bedrooms ironically facing the proposed development and although there is no right to 'Darkness', the lack of light pollution is a significant aspect of their wellbeing and choice to live at Little Armshead Farm.

Newfields Farm and the surrounding homes and farms, including those on Armshead Road, will all be detrimentally affected by this intrusive light pollution.

5. Noise pollution

The background noise 'hum' from the transformers, switching and substation WILL disturb the peace and rural quiet of the area, and will impact negatively on local wildlife and human residents. The report presented by the applicants' experts indicates this is not the case; however evidence from other UK facilities has shown that sound levels are not acceptable to local residents, despite the claims of planning evidence reports. Once approved it is too late, and retrospective mitigation in a sympathetic manner is not achievable.

6. Land drainage and quality

The UK needs more productive farmland and not less. The land is categorised as 3b due to wetness. This is correct, but simply due to neglect, and even despite this neglect, the owner has still produced a good crop of hay - big bales on multiple cuts per year of a good and useful value. The field immediately to the south-east of this proposed development has been correctly drained and has been historically used to very successfully grow a variety of crops. The applicants' field was formally drained, but the drains were damaged by large size heavy plant used when the electric pylons were installed, resulting in their collapse. With minimal investment the applicant field could be drained and become even more productive. The applicant had carried out zero maintenance on their land, and could arguably be termed a land investor rather than farmer. Traditionally, farmers would do their ditches as part of a routine maintenance cycle and install drainage or simply mole plough their land to improve it.

The land naturally drains north and ultimately to Stanley Pool. Any contaminants from this proposed development would clearly find their way to Stanley Pool, polluting the water course all the way there.

7. Site Access

This has already been raised as a concern by Highways. The access is poor and there is insufficient turning space without creating an enormous visibility splay, turning arc, and subsequent removal of a large section of drystone walling and hedge. The roads themselves Luzlow and Armshead roads are not built for the kind of traffic that would be needed in the construction of this proposed development.

Traffic during construction would be very detrimental to local inhabitants due to noise, dust and physical risk from heavy goods vehicles, and would potentially scare away perhaps permanently local wildlife.

8. Wildlife

One of the few positive outcomes of this proposal is that it has triggered a detailed interest and recording of the abundant wildlife in this area, and specifically of this site and surrounding fields. The area is literally teeming with wildlife, including brown hares, stoats and weasels, hedgehogs, foxes, deer, to name but a few. There are several species of bat present, and last week alone 18 species of birds were recorded including kites, barn owls, buzzard, kestrel, stone chat, willow warbler, grass hopper warblers and skylarks. The number of raptors is due to the unspoilt fields and abundance of mice, voles and shrews.

9. Proposed site

The Key Characterisation of the moorlands in our local government's assessment describes the land to potentially include small woodland as part of this feature, but most are ancient or long-standing. This site is open and gently undulating; the headline is - it is open, and to introduce anything else changes this, and results in destruction of the green belt with what could end up as permanent industrialisation.

The proposed development is incongruous and sits as a raw insult to the local landscape; Natural England should hang their heads in shame if they support this. The land surrounding Wetley Moor SSSI is the moors environmental buffer zone. Due to the relatively high number of people enjoying the moor for dog walking, a number of species do not breed or hunt on the moor, but on the surrounding fields which are minimally accessed by the farmers in course of their work, and so wildlife is undisturbed. The surrounding farmland and associated buildings provide habitat for wildlife and enhance the moor.

The planting of trees to the South of the proposed development is fairly pitiful. If mature specimens were planted they may be of benefit, but realistically it will be 20 years before they are of any size and of use to wildlife, and certainly wouldn't screen the development from the residents of Little Armshead farm, Newfields Farm or the general public - observing the site from the moor, and access road to Little Armshead Farm. There is no planting scheme for the West aspect of the development, just a row of trees.

The proposed development documentation indicates there will be 2.4m fencing around the site, some close board. There is also a 6m plus substation on the side of the site next to Armshead Farm. How will this be hidden? By a few saplings? And two very large water tanks.

What is happening to the 18,000 m² of material the applicant has confirmed in their plans that needs to be removed? If spread over their own adjacent land, this will spoil the fields as the vast majority of this volume will be subsoil or bed rock/mixed waste. This volume of material once extracted will double in volume as it is uncompacted. Where is the material waste plan?

10. Location

The site is not suitable, being too remote from Cellarhead substation, and is opportunistic in its nature. If the proposal is supported, it opens the door to further developments randomly across the countryside, which will ruin the character of the moorlands for ever. It is naïve to think these developments will be returned to pasture in 40 years; those reading this will be gone or old and the world technology will have moved on .

Where is the documented plan to restore this site to pasture in 40 years? What insurance do we have that this will happen and who is responsible when it doesn't? It is not good enough to state that this matter will be resolved in the future.

Finally, in conclusion, I object because this is destruction of the greenbelt, and does not meet the requirements for "special exemption".

'Just because we can, doesn't mean we should' is an expression that springs to mind.

In the near future better solutions will be found, but if we are not careful, the greenbelt will be already harmed substantially.

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