

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 08 April 2025 21:32:54

Application Reference No. : SMD/2024/0568

Site Address: New House Farm Luzlow Lane Bagnall Staffordshire ST9 9JZ Stoke-On-Trent

Comments by: Peter Plant

From:

Armshead Road
Werrington
Stoke on Trent
Staffordshire
ST9 0ND

Submission: Objection

Comments: I am a homeowner and have been consulted by SMDC regarding this application due to how close we are to the proposed site. I have lived here all my life (54years).

I would like to object to this application. The site in the application adjoins my land and the BESS site will be clearly visible from my property and land impacting on my family directly. We haven't received any contact or information from the applicant regarding any details about this development or to consult with us despite our close proximity to the site. This has upset us greatly as it has shown there is absolutely no regard to the safety or impact on our local community.

I would like to raise my concerns as follows:

Fire Risk

The site is extremely closer to us with the site directly contacting our field. I am frightened for the safety and welfare of my family in the event of a fire. The chemical toxic fumes and smoke will pose a risk to our health and safety. Our closeness would mean that we would have to evacuate to escape the smoke and fumes. From the plans it can be seen that there is only one access in and out of the BESS site. If there was a fire the fire service would not allow operatives to enter a site where they may become trapped due to health and safety and risk to life. Access to the site cannot be gained across other fields due to terrain, ditches, walls and fences meaning that vehicles would be unable to cross and gain access.

Government guidance for Renewable and low carbon energy states that applicants for BESS sites are encouraged to consider guidance produced by the National Fire Chiefs Council when preparing the application. The location of such sites are of particular interest to fire and rescue services; who will seek to obtain details of the design, and firefighting access and facilities at these sites in their register of site specific risks that they maintain for the purposes of Section 7 of the Fire and Rescue Services Act 2004. From looking at the application the Fire and Rescue service have not been consulted. Why? What is the procedure and policy if there is a fire? What about residents? These batteries would be allowed to burn out and water just used for cooling. The two nearby properties are hazardously close with one only being 80 meters away from the BESS site. The risk of danger to life is so great. Who will take responsibility for this?

Water contamination

There are known bore holes and wells within the area immediately by the BESS site. This information can be found online via the British Geological Service. We are in the process of registering our well at the moment so that this data is up to date. We can provide details of our wells location. I am aware that there are another three boreholes in the immediate vicinity of the site one of which is already registered, one is unregistered and one is in the process of being registered. The bore hole at Little Armshead Farm is its ONLY source of water. There are also further wells in the immediate area and residents use these for their livestock.

The immediate area covering and surrounding the applicant site also has a network of ditches here and a stream which is a tributary of Stanley Pool which runs through the field of the application. This stream runs into Springs at the bottom of Bagnall then into Stanley pool. The land natural gradient slopes downwards from the common and the water flow naturally runs down through the application towards Stanley Pool as explained. I have enclosed information showing the flow of water from a survey commissioned regarding Wetley Moor by Stoke on Trent Council and Staffordshire Moorlands. In the event of a fire the water from the water tanks use to cool the surrounding area combined with water from possible rainfall means that there is an extremely high risk of contamination entering the water course contaminating everything on its way to Stanley Pool.

Wildlife

Wetley Moor is an SSSI impact zone and is only 130m from the BESS site. Not only is this area rich in wildlife its recorded habitat includes whitethroat, linnet, skylark, reed bunting and Grasshopper Warbler. It is used on a daily basis by dog walkers, hikers etc and the general public visit the area to walk and enjoy the surroundings. The BESS site will lead to the destruction of this wildlife habitat as the wildlife transfers from the common onto our land as it is quiet and offers protection. The area is currently home to numerous species of wildlife including curlews, red kite, bats and barn owls. The bats and barn owls fly across to us from neighbouring land and they also cross over the application site and Wetley Moor as part of their habitat. Anything put in place by the applicant is insufficient (the planting options do not even cover the site and will take years to become of any use) it feels it is just a gesture and cannot in any way shape or form compete with what nature has already provided. The lighting from this site will ensure that wildlife will keep away and will disturb wildlife patterns.

Noise and light pollution

The noise levels from the site will disturb mine and neighbouring households. We are rural with extremely low noise impact at present and should the application be passed, we will be subjected to higher noise levels from the site. This will cause a disturbance and affect our quality of life. It is known that whilst companies state that there is no noise from these sites the reality is very different. The hum is on-going 24/7. There will be noise from the invertors, transformers and cooling systems and with households being so close to this will SMDC be able to support us when industrial noise complaints are made to them? How will these be actioned? One property is only 80 meters away from the proposed site. The BESS technology is relatively new for the UK but looking at data from other countries which are more evolved noise is a proven concern. The application states that there will also be fencing, lighting and CCTV erected which will be clearly visible at night causing light pollution and disruption to both residents and wildlife. Little Armshead Farm directly face this giving them no escape or respite.

Devaluation

This application will devalue my property due to the close proximity. Due to health and safety concerns my property will be come difficult to sell.

Site

My family has lived at our address for four generations. Prior to the current ownership the land in the proposed application was used to raise cattle and I worked on this land for the previous owner for over 30 years. It is still used for hay which is mowed and taken off the land each year by the current owner and there are currently bales on these fields. This land is both Green Belt and proven good quality farming ground. The applicant states that the ground isn't of good quality but this is due to wetness from the management of the land but hay is still managed to be grown and taken from the land each year. My father put drainage in our fields and our land is of good quality. The applicants land could be improved with active land management.

This area is used and enjoyed by the public for leisure pursuits with walkers, horse riders and cyclists regularly using the area, in particular the roads that run alongside the proposed site. There are also local businesses in the area including a family run caravan site directly across from the site and a nursery.

The site will mean increased traffic in the area. The applicant advised that 18,000 m2 of soil is to be removed from the site. Where is this to go? The trips to remove this will cause further chaos and damage to our already struggling semi-rural roads which cannot cope with HGV or other industrial vehicles. The increased traffic volume will cause further noise, pollution, disturbance and wear and tear on roads. There are several other applications actions for BESS sites in the immediate area of which four are already passed. The construction work in the area is going to cause absolute chaos.

Industrialisation of the greenbelt and other applications in area

I have attended hearings in the SMDC chambers regarding other BESS applications in the area. Each time it is mentioned about the Green Belt and the area in which we live and the industrialisation of the area but nothing is done. You can clearly see from the plan attached from your portal that all this land for BESS sites joins up. The area is becoming industrialised. I urge that SMDC undertake an assessment of the cumulative effect on the area of these sites and I would be interested to know why that hasn't yet been done. Each site is assessed in its own right when it can be clearly seen that they cover the local area (over 400 acres). Are there specialists liaising with SMDC to assist regarding the technicalities of these sites and the issues they bring with them as they are specialist outside normal planning.

The applicant states in its 'Luzlow - Alternate Site Assessment FINAL' document that 'Proximity to sensitive receptors: the site must be an appropriate distance from sensitive receptors such as domestic, ecological and sensitive commercial (e.g. schools/hospitals/care homes) so as to not cause nuisance by way of noise or visual disruption - this is achieved at this site,

I do not believe this has been achieved. The site is 80 meters away from Little Armshead Farm which is someone's home, 130 meters away from Wetley Moor which is a registered SSSI, within Green Belt and it will be clearly seen from the common, people properties and land and public highways.

The document also states that this area has been chosen as it falls within 2km of the substation. It says 'As stated in the Planning Statement, the proposal is considered to comply with the requirements of the NPPF with regards to its location within the Green Belt. It is considered that the site constitutes grey belt in the context of the new NPPF (paragraph 155), whereby developments such as this are not inappropriate. If the LPA disagree, it is however considered that the harm by reason of inappropriateness plus any additional harm is clearly outweighed by the locational constraints of the development and the wider environmental benefits of this proposal, such that this amounts to very special circumstances to justify its Green Belt location;

I argue this point.

By the terms of the new NPPF (paragraph 155) I would consider this site to be inappropriate. Firstly, the land has not been formally classified as Grey Belt. The applicant itself refers to the land as Green Belt through all documents besides this closing paragraph where they then decide to say it is considered Grey Belt. It is referred to as Green Belt all the way through because it is Green Belt as shown on SMDC interactive planning map.

Our Green Belt does stop the sprawl into the city and stop areas merging. It is also part bordered by Wetley Moor which safeguards our countryside as can be seen in Figure 4 on page 11 of this document.

There isn't an unmet need for this kind of development in the area. There are already four BESS sites passed and further ones under application / appeal in the area.

This development isn't in a sustainable location. The fire risk is huge, the fire service haven't been asked to look at the plans and there will be chaos to the infrastructure due to all the construction in the area on a semi rural road network that is already struggling.

The process of installing the batteries will mean that this ground will not be able to be returned to its original usage in 40 years time. There is no plan shown on the application of how this will be done showing that it is viewed as someone else's problem.

I have lived here all my life and my family have been here four generations. I have a heavy heart and I feel that the characteristics of the Staffordshire Moorlands are being destroyed. Where does this industrialisation of the Green Belt end for us in this area? Once the Green Belt is used for these sites it will be gone forever. In 40 years time it will be impossible to put back in place what has been here forever. Farm land will be gone forever. Where will our food security come from in an age where the world order is becoming unstable and trade wars are becoming standard. I fear for the younger generations.

I believe these points should be observed and that the application should therefore be refused.

Thank you,

Peter Plant

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