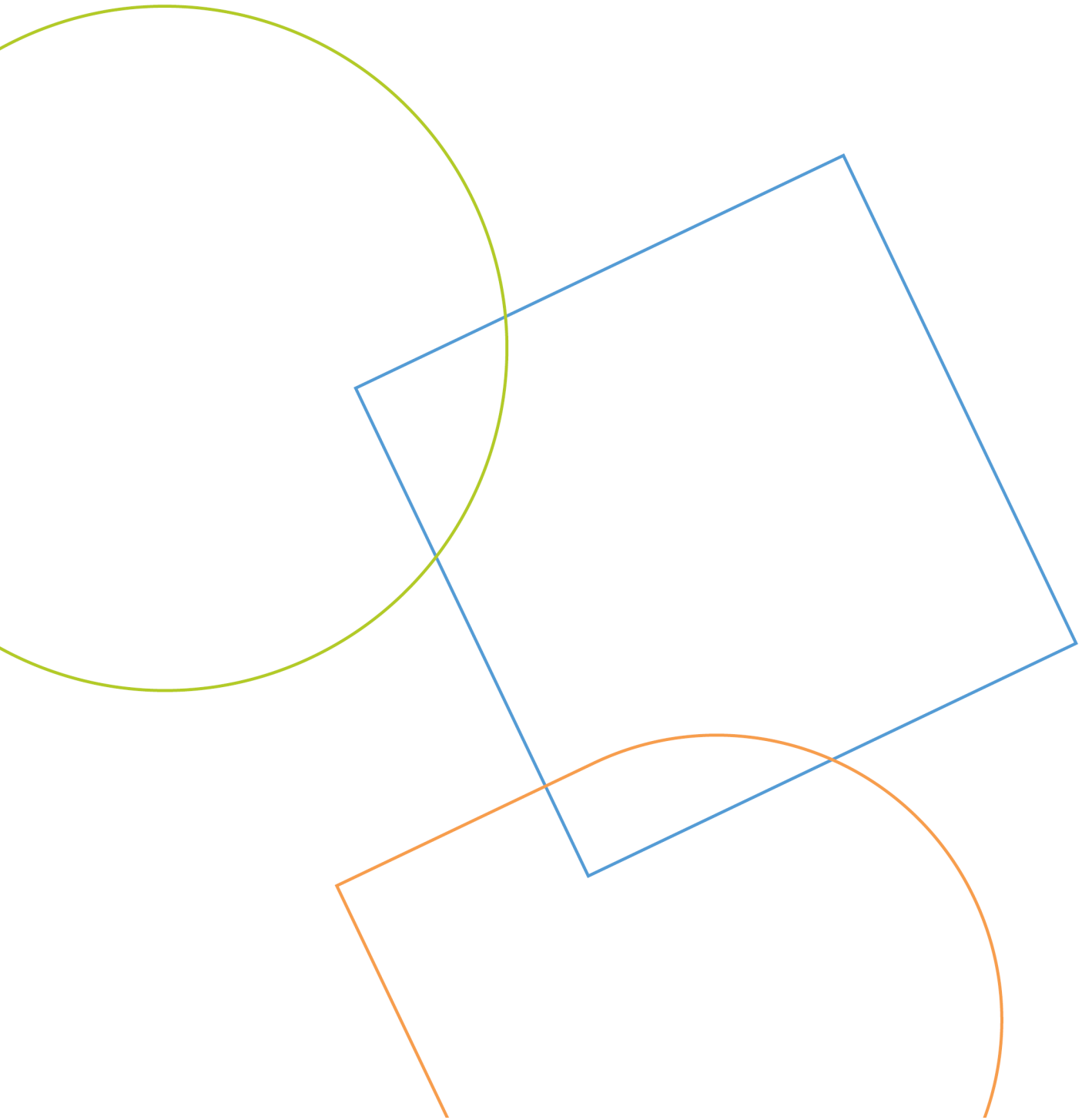




3306/P | Tean Leys BESS, ST10 4NS | Planning, Design and Access Statement



Planning, Design and Access Statement

Tea Leys Farm, Tea Leys, Leigh, Staffordshire, ST10 4NS

Prepared for: Tea Leys Energy Storage Ltd.

May 2025

Office Locations

Cambridge

1A Clifton Court, Clifton Road,
Cambridge, CB1 7BN
01223 776740

London

Moor Place, 1 Fore Street Avenue,
London, EC2Y 9DT
020 3011 0820

Norwich

Brettingham House, 98 Pottergate,
Norwich, NR2 1EQ
01603 631319

Bath

Newark Works, 2 Foundry Way,
South Quays, Bath,
BA2 3DZ
01225 690119

Manchester

One St Peter's Square,
Manchester,
M2 3DE
01617 111740

Edinburgh

1 Lochrin Square,
92-98 Fountainbridge,
Edinburgh, EH3 9QA
01316 000319

York

Stanley Harrison House, The Chocolate Works,
Bishopthorpe Road,
York, YO23 1DE
01904 803800

Issue Sheet

Document Prepared for: Tea Leys Energy Storage Ltd.

Planning, Design and Access Statement:

Tea Leys Farm, Tea Leys, Leigh, Staffordshire, ST10 4NS

Prepared by:

Name: Beccy Rejzek MRTPI

Title: Associate Director of Planning

Date: May 2025

Approved by:

Name: Graham Robinson Hodges MRTPI

Title: Regional Director of Planning

Date: May 2025

Revision: V1

Contents

1	INTRODUCTION	1
1.1	OVERVIEW	1
1.2	THE SITE AND SURROUNDINGS	1
1.3	SUPPORTING DRAWINGS AND DOCUMENTATION	2
1.4	PURPOSE OF THIS PLANNING, DESIGN AND ACCESS STATEMENT	3
2	PLANNING HISTORY	4
2.1	THE SITE AND SURROUNDING AREA	4
3	DESCRIPTION OF THE DEVELOPMENT	6
3.2	ENERGY STORAGE	6
3.3	FENCING AND SECURITY	7
3.4	ASSOCIATED INFRASTRUCTURE	7
3.5	SITE ACCESS	7
4	PLANNING POLICY CONTEXT	9
4.1	PRIMARY LEGISLATION	9
4.2	STAFFORDSHIRE MOORLANDS DEVELOPMENT PLAN	9
4.3	CHECKLEY PARISH NEIGHBOURHOOD DEVELOPMENT PLAN	10
4.4	OTHER MATERIAL CONSIDERATIONS	10
5	SITE SELECTION	13
6	PLANNING ASSESSMENT	16
6.1	INTRODUCTION	16
6.2	THE NEED FOR THE DEVELOPMENT	16
6.3	THE PRINCIPLE OF DEVELOPMENT	17
6.4	LANDSCAPE	19
6.5	HERITAGE	24
6.6	DESIGN CONSIDERATIONS	25
6.7	NOISE	26
6.8	LIGHTING	27
6.9	AIR QUALITY	27
6.10	ECOLOGY, BIODIVERSITY AND ARBORICULTURE	30
6.11	TRANSPORT AND HIGHWAYS	33
6.12	FLOOD RISK, DRAINAGE AND FIREWATER ATTENUATION	34
6.13	COAL MINING RISK ASSESSMENT (CMRA)	36
6.14	PLANNING BALANCE	37
7	CONCLUSION	38
7.1	SUMMARY	38

1 Introduction

1.1 Overview

1.1.1 This Planning, Design and Access Statement has been prepared by Lanpro Services Limited ('Lanpro') on behalf of our client, Tea Leys Energy Storage Ltd ('the Applicant'), in respect of an Application for Full Planning Permission ('the planning application') for the Proposed Development of a battery energy storage system and associated infrastructure, access and cable route on land at Tea Leys Farm, Tea Leys, Leigh, Stoke-on-Trent, Staffordshire, ST10 4NS ('the Site'). The Site is located in the administrative boundary of Staffordshire Moorlands District Council ('the Council').

1.2 The Site and Surroundings

1.2.1 The Site covers an area of 10.7 hectares including the proposed cable route corridor and access routes. It is located to the south of the village of Tea and Upper Tea and to the north of the A50.

1.2.2 The part of the Site that will host the Battery Energy Storage System (BESS) is located on an agricultural field, currently in use as pasture and is bounded by agricultural (pasture) land along all boundaries. This field is located immediately to the west of the Tea Leys Farm farmstead which houses several farm buildings including the farmer's residence. Tea Leys Farm is a poultry and egg farm.

1.2.3 The farmstead is accessed from the east via a private road, off Leigh Lane that has been developed to accommodate vehicle traffic to the farm.

1.2.4 The fields that accommodate the proposed cable corridor to the south leading up to the 132kv substation (approved under planning application ref. SMD/2023/0594) are in agricultural use (mostly pasture). The fields north of the proposed BESS site are also predominantly pasture with the remainder of the cable running under Staffordshire County Council (SCC) Highway controlled land to the existing 33kv substation in upper Tea.

1.2.5 There are no Public Rights of Way (PRoW) either within or adjacent to the fields housing the BESS Site. The following are located at varying distances from the Site:

- PRoW Checkley 12, c.200m SE
- PRoW Checkley 42, c.350m NE
- PRoW Checkley 14, c.415m SW
- PRoW Checkley 43, c.600m S
- PRoW Checkley 15, c.715m NW

- 1.2.6 While no PRowS are located within or adjacent to the proposed BESS Site, a number are located in the path of the underground cable route and so will face short-term disruption during the construction phase. These include:
- PRow Checkley 5.
 - PRow Checkley 9.
 - PRow Checkley 12.
 - PRow Checkley 14.
 - PRow Checkley 7.
- 1.2.7 A number of PRowS cross or are also located along the route of the proposed access track and will be utilised during the construction phase and for occasional maintenance. These include:
- PRow Draycott in the Moors 15.
 - PRow Checkley 7.
 - PRow Checkley 43.
 - PRow Checkley 12.
- 1.2.8 A PRow map is included at Figure 5.2 of the Transport Statement. A Public Rights of Way Management Plan will be implemented during the construction phase to minimise impacts upon PRow.
- 1.2.9 The Site does not accommodate any listed buildings. The closest listed buildings are the Grade II* listed Tea Hall and New Tea Hall Mill, and the Grade II listed 14, 14a, and 16 High Street which are located approximately 150 metres to the northeast of the cable route and 1.13km to the north of the proposed BESS Site.
- 1.2.10 The site is not covered by any statutorily designated ecological sites, nor do any lie within 5km of the Proposed Development. "The Wing Drumble", an area of Ancient Semi-natural Woodland, lies approximately 0.6km east of the Site.
- 1.2.11 The BESS Site is wholly within flood zone 1 as identified on the Environment Agency's Flood Risk maps.
- 1.2.12 The BESS Site is currently a green field under pasture and is classified as being Grade 3 agricultural land under Natural England's Agricultural Land Classification Map. On-site soil quality testing has been undertaken and has confirmed the site to be, in fact, Grade 4. An Agricultural Land Quality Report is included within this planning application confirming this.
- 1.3 Supporting Drawings and Documentation**
- 1.3.1 This Full Planning Application is supported by the following drawings and documentation:
- Completed application form.

- Completed ownership certificates.
- Correct Fee.
- Location Plan and detailed Drawings (See covering Letter for details).
- Planning Design and Access Statement.
- Statement of Community Involvement
- Technical Reports (See Covering Letter for details).

1.4 Purpose of this Planning, Design and Access Statement

- 1.4.1 This Planning, Design and Access Statement provides an assessment of the Proposed Development in the context of pertinent national planning and design guidance and local planning policy. This Planning, Design and Access Statement should be read alongside all other drawings and documentation submitted as part of this planning application.

2 Planning History

2.1 The Site and Surrounding Area

2.1.1 Based on a review of the council's online planning register, there have been a number of relevant planning applications directly relating to the Site. Those applications which are considered pertinent are summarised in the table below.

Reference	Stated Address	Description	Date of Decision	Decision
SMD/2024/0536	Tea Leys Farm , Tea Leys , Lower Tea , Staffordshire, ST10 4NS	Environmental Impact Assessment (EIA) Scoping Opinion for a proposed development of Tea Leys Battery Storage	24/01/2025	EIA Not Required
SMD/2023/0594	Land at Blythe House Farm, south of the A50 , Draycott in the Moors , ST10 4JN	Installation of a solar array, substation and associated works forming an extension to Blythe Solar Farm (ref: SMD/2022/0160)	22/07/2024	Approved

2.1.2 Based on a review of the council's online planning register, there have also been a number of relevant planning applications approved in the surrounding area (within 5km) of the Site. These are summarised in the table below.

Reference	Stated Address	Description	Date of Decision	Decision
SMD/2023/0594	Land at Blythe House Farm, south of the A50 , Draycott in the Moors , ST10 4JN	Installation of a solar array, substation and associated works forming an extension to Blythe Solar Farm (ref: SMD/2022/0160)	22/07/2024	Approved
SMD/2023/0197	Totmonslow Farm, Draycott Road, Totmonslow, Upper Tea, ST10 4JJ	Temporary development of a solar farm (15MW) with ancillary infrastructure, security fence, access,	17/08/2023	Approved

		landscaping and continued agriculture, to generate power to feed into the local distribution network.		
SMD/2022/0160	Upper Newton Farm, Draycott Road, Upper Tea, Staffordshire, ST10 4JN	Installation of solar farm (27.7MW) with battery storage (30MW) facility and associated works.	01/02/2023	Approved
SMD/2014/0197	Lower Newton Farm, Draycott Road, Upper Tea, Staffordshire, ST10 4JN	The erection of a solar photovoltaic (PV) array (11.5MW) and ancillary development.	26/08/2014	Approved

3 Description of the Development

- 3.1.1 The Proposed Development is for a battery energy storage system (BESS) facility in the form of batteries and associated infrastructure. The purpose of the Proposed Development is to provide storage capacity with energy balancing capabilities for the National Grid. When there is an excess of renewable energy being produced from e.g. solar during the day, or wind, the energy can be stored on the Site until it is needed, at which point it will be drawn upon by the National Grid. This is an essential component of the UK's journey towards achieving net zero.
- 3.1.2 The Site does not provide energy storage directly linked to any of the operational, or consented solar schemes in the local area, although it is possible that some of the excess energy produced by these could end up being stored in the batteries via the National Grid.
- 3.1.3 The development will consist of a number of different elements which are described below. A site layout plan is provided in **Appendix 1**.

3.2 Energy Storage

- 3.2.1 The design principles and key characteristics of the BESS Site itself are listed below for clarity:
- The battery storage will have a capacity of 70MW.
 - The compound is split into two main battery storage sections: the eastern portion provides 50MW storage connected to the 132kv substation to the south of the Site. The western portion provides 20MW storage connected to the 33kv substation to the north of the Site.
 - The overall compound area measures approximately 120m x 170m.
 - Battery containers would have a maximum length of 6m, maximum width of 3m and a maximum height of 4m each.
 - The maximum storage capacity of a single battery container would be approximately 5MW.
 - Battery inverter units would measure 5.4m in length x 2.2m width x 2.3m in height each.
 - Palisade fencing will be provided around the compound with a maximum height of 3m.
 - Internal access tracks have a width of 4m.
 - A secondary access into the compound area is provided to meet Staffordshire Fire and Rescue Service requirements.

3.3 Fencing and Security

3.3.1 The design principles of the fencing and security are listed below for clarity:

- A deer type wire mesh and wooden post fencing with a maximum height of 2.5m.
- CCTV camera on poles with a maximum height of 3m.
- CCTV poles to be galvanised steel painted dark green.
- No flood lighting is proposed.

3.4 Associated Infrastructure

3.4.1 The development also requires the installation of associated infrastructure required for the running of the battery storage site which comprises:

- 2 no. customer substation and transformers – Maximum height 3.95m located within the compound area.
- Cable run to the south and north of the BESS site connecting with the respective substations.
- 2 no. Water tanks either side of the BESS (4 no. In total) as a fire safety measure.

3.4.2 It should be noted that the application includes within the site boundary the extent of the approved 132kv substation as this component is required to enable the operation of the BESS. However, given that this infrastructure has already been assessed and approved under SMD application ref. SMD/2023/0954, the applicant is not seeking permission for the substation but simply the connection to it.

3.5 Site Access

3.5.1 The BESS Site will be accessed from the existing entrance into the field via the road to Tea Leys Farm to the east, off Leigh Lane. A secondary access point within the field hosting the BESS site is also proposed to provide an alternative access for emergency vehicles in the case of fire.

3.5.2 A separate vehicular access east of the approved 132kv substation (see application ref SMD/2023/0594) is also proposed. This will be for routine maintenance of the substation and serves both Lower and Upper Newton Farms. This track itself is accessed via a private road off Draycott Road to the northeast of the site at Draycott in the Moors. construction of the cable route and connection to the approved 132kv substation under application ref. SMD/2023/0594.

3.5.3 The main traffic generated by the development will be during the construction period which will be relatively short. A Construction Traffic Management Plan (CTMP) has been submitted which sets out proposed routing and management measures.

- 3.5.4 At this stage, it is anticipated that deliveries into the site will be concentrated during construction which will cover a 12 -18 month period.
- 3.5.5 Once operational, traffic movements to and from the site would be minimal, with only a maintenance team requiring access to the site periodically.

4 Planning Policy Context

4.1 Primary Legislation

- 4.1.1 This chapter identifies the local planning policies providing the framework against which the application would be determined, together with any relevant material planning considerations.

4.2 Staffordshire Moorlands Development Plan

- 4.2.1 The Development Plan for Staffordshire Moorlands District consists of the Staffordshire Moorlands Local Plan (adopted September 2020). It sets out the key elements of the planning framework for the district which will be used when considering individual planning proposals.
- 4.2.2 The Local Plan is almost 5 years old and will be due for review later in 2025. Nevertheless, it remains of relevance to the determination of this application, albeit more up-to-date policy within the NPPF has increased weight as a material consideration in the determination of the application.
- 4.2.3 Pre-application advice reference PAD/2024/0028 was received from Staffordshire Moorlands District Council (SMDC) on 13th February 2025, which stated the relevance of a number of policies from the Staffordshire Moorlands Local Plan (adopted September 2020) in the determination of the application. These policies are outlined below:
- Policy SS1: Development Principles.
 - Policy SS10: Other Rural Areas Strategy.
 - Policy SD1: Sustainable Use of Resources.
 - Policy SD2: Renewable/Low-Carbon Energy.
 - Policy SD4: Pollution and water quality.
 - Policy SD5: Flood Risk.
 - Policy DC1: Design Considerations.
 - Policy DC2: The Historic Environment.
 - Policy DC3: Landscape and Settlement Setting.
 - Policy C3: Green Infrastructure.
 - Policy NE1: Biodiversity and Geological Resources.
 - Policy NE2: Trees, Woodland and Hedgerows.
 - Policy T1: Development and sustainable transport.

4.3 Checkley Parish Neighbourhood Development Plan

4.3.1 The Site's location wholly within the Civil Parish of Checkley means that the policies of the Checkley Parish Neighbourhood Development Plan (adopted May 2024) are also pertinent to the determination of this planning application.

4.3.2 Pre-application advice reference PAD/2024/0028 highlighted the relevance of the below policy from the Checkley Neighbourhood Plan (adopted May 2024):

- Policy DES3: Landscape and Rural Character.

4.4 Other Material Considerations

The Landscape and Settlement Character Assessment (LSCA), 2008

4.4.1 The LSCA assesses the landscape and settlement character of Staffordshire Moorlands; in doing so it establishes key sensitivities within the landscape along with providing guidance for development. The guidance provided serves to maximise the potential improvements to the landscape to avoid potential adverse impacts.

Staffordshire Biodiversity Action Plan, 1998

4.4.2 The Staffordshire Biodiversity Action Plan (SBAP) was adopted in 1998 and serves to coordinate UK DAP targets at a local level. It is structured to provide guidance at an overarching county level and through the Ecosystem Action Plans (EAPS) which focus on specific sub-county level ecosystems.

Staffordshire Moorlands Strategic Green Infrastructure Network, 2017

4.4.3 The Staffordshire Moorlands Strategic Green Infrastructure Network (SGIN) identifies the network of multifunctional green space (green infrastructure) across the district and advises on how it should be managed, improved, and extended along with insight into the interrelationship between development and the network. It also contains the Staffordshire Moorlands Biodiversity Opportunity Map.

National Planning Policy Framework (NPPF)

4.4.4 National planning policy is set out in the National Planning Policy Framework ('the Framework'), the latest version of this document was published in December 2024 and forms the new Framework within which regional and local policy is set. The publication of the Planning Practice Guidance (PPG) in November 2016 and its most recent revision in December 2024 gives further guidance to the provisions of the Framework. The parts which are considered of particular relevance to this Proposed Development are detailed below.

4.4.5 The purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. Paragraphs 8 of the Framework goes on to say that these objectives are economic, social and environmental.

- 4.4.6 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 4.4.7 Paragraph 48 states that *'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise'*.
- 4.4.8 Paragraph 161 outlines the governments objectives of achieving net zero by 2050. It states that *'The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure'*.
- 4.4.9 Paragraph 168 goes on to state that *'When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future'*.
- 4.4.10 Paragraphs 187 through 191 of the NPPF highlight the need for planning policy to work to contribute to and enhance the natural environment. Valued landscapes should be protected and enhanced in a manner commensurate with their statutory status or identified quality in the development plan.
- 4.4.11 Paragraphs 192 to 195 emphasise the role of the planning system to protect and enhance habitats and biodiversity. If a significant harm to biodiversity, habitats, SSSIs, SPAs and SACs resulting from a development cannot be avoided or adequately mitigated, or compensated for, then planning permission will not be supported. Development which conserves or enhances biodiversity will be encouraged.
- 4.4.12 Paragraphs 202 to 221 concern the conservation and enhancement of the historic environment. Proposals that are likely to affect heritage assets should be subject to appropriate assessments. Development that is likely to result in a substantial harm to or total loss of significance of a designated heritage asset will not be permitted, unless it is demonstrated that the benefits of the development outweigh the harm or loss.

National Planning Policy Guidance (NPPG)

- 4.4.13 National planning guidance on battery energy storage systems states:
- 4.4.14 *“Electricity storage can enable us to use energy more flexibly and de-carbonise our energy system cost-effectively – for example, by helping to balance the system at lower cost, maximising the usable output from intermittent low carbon generation (e.g. solar and wind), and deferring or avoiding the need for costly network upgrades and new generation capacity.”*
- 4.4.15 Applicants are also encouraged to engage with the relevant local fire and rescue service before submitting an application to the local planning authority so that matters relating to the siting and location of battery energy storage systems, in particular in the event of an incident, prevention of the impact of thermal runaway, and emergency services access can be considered before an application is made.
- 4.4.16 Applicants are also encouraged to consider [guidance produced by the National Fire Chiefs Council](#) when preparing the application.

5 Site Selection

5.1.1 There is no explicit requirement through either the development plan or the NPPF, for applicants to undertake a Site Selection Assessment in respect of BESS Sites.

5.1.2 Nevertheless, in choosing this particular Site, the Applicant has had regard to National and Local planning policy requirements in respect to:

- Giving preference to development on previously developed land in the most sustainable locations (Policy SD1 of the Staffordshire Moorlands Local Plan and NPPF paragraph 89).
- Using poorer quality agricultural land in preference to higher quality ((Policy SD1 of the Staffordshire Moorlands Local Plan and footnote 65 of NPPF).
- Applying a sequential, risk-based approach to the location of development – taking into account all sources of flood risk (Paragraph 172 of NPPF).
- Protecting and enhancing valued landscapes, heritage assets and biodiversity (NPPF paragraphs 187 and 202).

5.1.3 The Applicant therefore undertook the following site selection process which resulted in the choice of this particular Site for the Development:

1) Finding a Suitable Grid Connection

5.1.4 A viable grid connection is an essential material consideration and is instrumental in defining the search area for a BESS site. Grid connection costs vary dependant on scheme size, grid capacity and local grid infrastructure.

5.1.5 In 2023 the applicant agreed an offer for connecting in 2027 with National Grid for a 50MW connection into a new 132kv substation to the south (approved under SMD/2023/0594) and a 20MW connection into the existing 33kv substation in Upper Tea.

5.1.6 A viable grid connection distance for a 20MW Site is 2km and for a 50MW site would be 5km. A search area of two kilometres around the northern substation and 5 kilometres around the southern substation was therefore used to define the Area of Search.

2) Review of Environmental Designations and Agricultural Land Classification

5.1.7 Within the Area of Search, environmental designations were then considered. The EIA regulations 2017 identify a sensitive area as land notified under Section 28 (1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981(23); a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(24); the Broads(25); a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(26); a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(27); an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(28) as confirmed by the Secretary of State; a European site.

5.1.8 In addition to these sensitive area designations, other local ecological and landscape designations were also considered e.g. SSSI's, County Wildlife Sites and Areas of High Landscape Value as defined in Local Plans.

5.1.9 Agricultural Land Classification (ALC) in accordance with Natural England mapping was also considered with the aim of avoiding 'Best and Most Versatile' land (grades 1, 2 and 3a).

3) Consideration of Brownfield Sites

5.1.10 A search of the Staffordshire Moorlands brownfield register (now updated to 2024 as per details below) was also undertaken to identify potential brownfield sites within the Area of Search. If two separate battery storage sites for each connection point were to be taken forward a site area of at least 2ha would be required to accommodate each development including land for biodiversity net gain, ancillary infrastructure and emergency access route.

5.1.11 The 2024 brownfield register contained only 3 sites of at least 2 ha and these were all discounted as unsuitable due to distance from the points of connection as set out in table 5.1 below.

Site	Area (ha)	Reasons for discounting
Spring Hill, Mount Road, Leek	3.5	Located 10km north of Upper Tea and therefore, outside of the search area. Proximity to residential properties.
Hughes Concrete, Leek	6.59	Located 10km north of Upper Tea and therefore, outside of the search area. Proximity to residential properties. Has outline planning permission for residential use.
Former Fole Dairy, Fole	2.18	Within 5km of southern 132kv sub station but located close to existing residential properties. Has reserved matters permission for residential use.
Cecil Mill, Cheadle	3.85	Located 17km north of Upper Tea and therefore outside of the search area. Proximity to residential properties. Has reserved matters permission for residential use.

4) Finding a Willing Landowner

- 5.1.12 The applicant then searched for a willing landowner on unconstrained land within the identified Area of Search. The availability of willing landowners is an important consideration because without them, a development of this nature is undeliverable. It is desirable to compile a site and cable connection in as few land ownerships as possible to minimise legal complexities and project costs.

5) The Selected Site

- 5.1.13 The chosen site was considered suitable for the following reasons following the site selection process:
- It is located within 5km of the 132kv substation and within 2km of the 33kv substation.
 - It is 4.1 ha and therefore large enough to accommodate a 70MW battery storage scheme on a single site making use of both points of connection (50MW to the 132kv substation to the south west and 20MW to the 33kv substation in Upper Tea, to the north). This provides efficiencies in terms of limiting the provision of on-site infrastructure.
 - The combined 70MW connection via both of these sub stations has been agreed with National Grid for energisation in 2027.
 - The site is not located in a sensitive area as defined within the EIA regulations 2017 and there are no other ecological or landscape designations within or adjacent to the site.
 - It comprises Grade 4 (not best and most versatile) agricultural land as confirmed by on-site soil testing and reported within the ALC Report by LRA which accompanies this application.
 - The site is not in an area at risk of flooding according to Environment Agency (EA) flood mapping, as reported within the Flood Risk Assessment (FRA).
 - It is not located in close proximity to residential properties.
 - The land for both the battery site and the cable route is in the majority ownership of three willing landowners and option agreements have been entered into in respect of the Site.
- 5.1.14 In conclusion, there are no obviously more suitable locations within the Area of Search than the proposed Site for the Development. The Site is therefore assessed to be suitable and available for the scale of BESS and cable route proposed.

6 Planning Assessment

6.1 Introduction

- 6.1.1 Under section 38(6) of the Planning and Compulsory Purchase Act (TCPA) 2004, the determination of planning applications must be in accordance with the approved development plan unless material considerations indicate otherwise.
- 6.1.2 Through consideration of the Development Plan and other planning policy documents, the following matters are considered relevant:
- The need for and principle of the development; and
 - Environmental considerations (including transport and access, landscape and visual amenity, environment, heritage, ecology/biodiversity, and flood risk).

6.2 The Need for the Development

- 6.2.1 The NPPF is heavily supportive of renewable energy development. It places an over-riding emphasis on the presumption in favour of sustainable development, which this development clearly constitutes. Infrastructure, which is required to ensure the generation of renewable energy, is inherently sustainable under the NPPF.
- 6.2.2 The UK is legally bound through the Climate Change Act (2008) to cut greenhouse gas emissions by 80% by 2050, compared to 1990 levels. The Renewable Energy Directive 2009/28/EC sets targets for Member States in respect of the use of energy from renewable resources. In January 2018 the EU revised the 2030 energy mix target from 27% to 35% renewables. The Development would contribute towards meeting these requirements and would also be fully supported by energy policy because it would assist in replacing outdated energy infrastructure and the move to a low carbon economy (likely to assist with more affordable energy bills).
- 6.2.3 Paragraph 161 of the NPPF states that the planning system should support the transition to net zero. The site has been assessed as a suitable location for battery energy storage as set out in Section 5, while leaving minimal impact on residential properties within the locality and the environment.
- 6.2.4 Paragraph 168 states that when determining planning applications for all forms of renewable and low carbon energy developments local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.
- 6.2.5 LPAs should approve the application if its impacts are or can be made acceptable. In this case, technical assessment work demonstrates that the impacts of the development are acceptable and EIA screening request reference SMD/2024/0536 confirms that Environmental Impact Assessment is not required for the Development.

6.2.6 Policy SD2 of the Local Plan states that the Council is committed to meeting the future energy demands of the district through renewable energy. Development proposals for renewable energy will be supported under Policy SD2 subject to the considerations set out below:

- the degree to which the scale and nature of a proposal impacts on the landscape, particularly having regard to relevant Landscape Character evidence and impact on the Peak District National Park (taking into account both individual and cumulative effects of similar proposals); **(See Section 6.4 below for how the Scheme complies).**
- the degree to which the developer has demonstrated any environmental/economic/social benefits of a scheme, as well as how any environmental or social impacts have been minimised (e.g. visual, noise or smell); **(See Sections 6.3 – 6.13 below).**
- the impact on designated sites of European (or successor), national and local biodiversity and geological importance in accordance with policy NE 1; **(See Section 6.10 below).**
- the impact on the amenity of residents and other interests of acknowledged importance, including the historic environment; **(See Sections 6.5, 6.7, 6.8, 6.9 below).**
- the degree to which individual proposals reflect current local evidence regarding the feasibility of different types of renewable or low-carbon energy at different locations across the District; **(See Section 5, Site Selection).**
- in the case of solar energy proposals that are not affixed to buildings or structures, applicants will be expected to demonstrate that they have examined whether previously developed land is available before greenfield land. Where agricultural land is proposed, poorer quality land should be utilised before higher quality agricultural land. **(not directly applicable to BESS schemes but see Section 5 for brownfield considerations).**

6.2.7 It is integral to planning decision-making that a balancing exercise is undertaken in respect of considering the benefits of development against impacts. Given the objective of transitioning to a low carbon future, there is a clear need for the development which it is considered will outweigh any minor impacts. This will be demonstrated through the remainder of this Planning, Design and Access Statement.

6.3 The Principle of Development

6.3.1 In line with the Climate Change Act 2008, the National Planning Policy Framework (NPPF) sets a presumption in favour of sustainable development.

- 6.3.2 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, identifying that sustainable development consists of economic, social and environmental roles.
- 6.3.3 Paragraph 11 advises that plans and decisions should apply a presumption in favour of sustainable development. The Development is considered to accord with the overarching principle of sustainable development, as it has a great potential to result in economic and social benefits in respect of supplying affordable, low carbon electricity. The impacts of the development on the environment have been carefully assessed as summarised within this Planning Statement and detailed within the accompanying Technical Reports. They are unlikely to result in any significant adverse impacts.
- 6.3.4 Policy SS1 of the Local Plan sets out general principles applicable to all development within the plan area. Policy SS1 requires all development to positively contribute to the district and be appropriate to the local context; this is set within the framework of sustainable development in terms of social, economic, and environmental objectives. All development within the district will be assessed against these overarching objectives and against the specific, relevant, policies within the Development Plan. The following sections of this Statement explain how the Proposed Development accords with these policies.
- 6.3.5 Policy SS2 sets out a settlement hierarchy which development should, ordinarily, be distributed in accordance with. However, SS2 notes that development outside of the settlement hierarchy is acceptable where a development proposal is considered appropriate on its individual merits. The Site is located outside of any identified settlement boundary and is considered to fall within the countryside.
- 6.3.6 Policy SD1 of the Staffordshire Moorlands Local Plan concerns the sustainable use of resources and gives preference to development on previously developed land in the most sustainable locations. Development should also aim to minimise soil disturbance and to retain ecological connectivity as far as possible. Policy SD2 does not make any locational stipulations other than noting that a hierarchical order of priority is to apply with respect to land use. This also requires development to use previously developed land as a priority followed by poorer quality agricultural land. It is supportive of small and large scale standalone renewable or low-carbon energy schemes.
- 6.3.7 The Site's location has been carefully selected following the site selection process set out in Section 5. This included investigation of the possible use of brownfield sites within the District. The Site Selection Assessment showed that there were no suitable and available brownfield sites within the area of search that are of sufficient size to accommodate a BESS of the required size.
- 6.3.8 The selected site utilises only poor-quality agricultural land. An Agricultural Land Quality Survey of the Site undertaken by Land Research Associates demonstrates that the land consists wholly of Grade 4 agricultural land with heavy topsoil over dense reddish clay.
- 6.3.9 Policy SD1 goes on to state that making sustainable use of resources and adapting to climate change will be achieved by '*supporting development that is located and designed*

to minimise energy needs and to take advantage of maximised orientation (subject to design and landscape policies)'. The Site is located to take advantage of and complement existing and approved energy infrastructure, it will achieve this by making use of the existing sub-station to the north of the Site within Upper Tea, and the sub-station to the southwest of the Site approved in July 2024 under application reference SMD/2023/0594. The Applicant has secured connection agreements with National Grid for both these sub stations as set out in Section 5.

- 6.3.10 The nature of the development is such that there is limited locational flexibility; in that the proposal is to serve as storage for excess energy generated by the electricity grid at times of low demand which would otherwise be wasted, and which can then be released back into the grid during high demand. It therefore needs to be located in close proximity to an available point of connection to the National Grid.
- 6.3.11 The Site Selection Process set out in Section 5 demonstrates that the Site benefits from an available Grid connection and that there are no other more suitable sites for the Development available within the Search area. Taken together with the absence of any allocations for renewable energy development in the Local Plan it is considered that battery storage sites are to be sited where it is most appropriate rather than following the settlement hierarchy. In addition, in order to minimise amenity impacts upon residential dwellings they are best located outside of urban areas.
- 6.3.12 The choice of the Site is considered optimal given its location between two grid connection points enabling shared on-site infrastructure. Its location on Grade 4 agricultural land and the distance from residential properties within the locality weigh in its favour.
- 6.3.13 The Council have not identified any specific areas for renewable energy developments in the district, therefore the consideration on the appropriateness of a site should be done on a site-by-site basis.
- 6.3.14 In summary, whilst the Site is in the countryside, its location on Grade 4 agricultural land, reduced visibility from the surrounding area, the lack of suitable brownfield sites and strong planning policy position in support of renewable energy make the principle of the development in this location acceptable subject to the consideration of the remaining elements of Policy SD2.

6.4 Landscape

- 6.4.1 A Landscape and Visual Appraisal (LVA) has been prepared by Lanpro and forms part of this application. The Appraisal is based upon the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVA3)¹ produced by the Landscape Institute and the Institute of Environmental Management and Assessment.
- 6.4.2 Under Local Plan Policy DC3 all development must have regard for the landscape within which it is situated. In addition, Checkley Neighbourhood Plan Policy DES 3: Landscape

and Rural Character requires development to complement the rural character of the area.

6.4.3 Local Plan Policy DC3 references five specific criteria which must be met, and these are addressed in turn below.

‘1) Resisting development which would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the setting of a settlement or important views into and out of the settlement as identified in the Landscape and Settlement Character evidence;’

6.4.4 The Site falls within National Landscape Area 68, Needwood and South Derbyshire Claylands, and is identified as settled plateau farmland slopes within the Staffordshire Moorlands LSCA. The key characteristics of which are:

- ‘Gentle undulating landform with flat open valleys
- Small scale ancient hedgerow field pattern
- Low lying wet fields with ponds and well vegetated streams
- Views limited by hedgerow pattern and dense tree cover
- Urban fringe farming with horse culture
- Incongruous A50 dual carriageway corridor and mainline railway’

6.4.5 Additional guidance is provided in relation to the management of the landscape. In the west of the LSCA, woodland planting is recommended to screen the advancing conurbation, this is to be coupled with the reinforcement and replacement of boundary treatments where appropriate to create further screening within the landscape. The LSCA also identifies that equestrian driven development and landscape change has negatively impacted on the landscape through the removal of hedges and the introduction of shelter for horses and where possible this should be reversed or counteracted (although the Applicant notes that equestrian development does not feature as part of this site or its immediate surroundings). The LSCA also notes that where possible, native woodland planting should be used to connect isolated blocks of woodland.

6.4.6 In light of the above, the LVA identifies the sensitivity of the landscape as medium. This is driven by the existing use and association of the Site within the wider farmstead and how this contributes positively towards the overall character of the Settled plateau farmland slopes combined with the presence of detracting features identified locally such as the A50 and the high voltage transmission lines. It is considered that whilst not unattractive, this is an area of ordinary landscape with high potential for substitution and demonstrates a quality that is fairly commonplace. It is assessed to have some scope for landscape change or positive enhancement.

6.4.7 The Development retains the existing field boundary hedgerows and trees. This allows the construction phase of the development to be somewhat screened locally whilst under construction. Given the position of the proposed infrastructure within the lower lying

areas of the Site, the enclosure provided by the adjacent ridgeline and the A50, there would be very limited (if any) appreciation of the proposals during the Construction phase or at Year 1. Once the planting has established (Year 15) this would provide greater enclosure and canopy cover across the Site allowing for it to become further absorbed into the surrounding landscape. Overall, the level of the landscape effects with regard to the Proposed Development once the landscape proposals had established at Year 15 have been assessed to represent a Negligible Neutral Effect on the wider landscape character of the area. There will be a Minor Adverse Effect at a more local level given the proximity to existing infrastructure, and association with the adjacent farmstead and sheds.

- 6.4.8 The LVA identifies there are a limited number of publicly accessible routes that offer views into or of the Site.
- 6.4.9 Public Footpath PRoW Checkly 12 leads north from Far Tea Leys Farm along an existing farm track. There is a section of the PRoW where views into the Site are possible between the A50 and the farm buildings. The existing views are dominated by the farmstead and the associated cattle and poultry sheds to the north east. The two telecoms masts stand as visual markers on the ridgeline. Given the surrounding built form, pylons and the Site's position in proximity to the main farmstead, there would be some synergy between the proposals and the existing farm activities. However, it is likely that until the new planting had become established that the development would appear as an intensification of the farmstead buildings. During the construction period, there would be a noticeable change across the Site to accommodate the construction process. Whilst this would be intensive, it would be at a distance from the PRoW with the intervening arable field and hedgerow boundaries helping provide separation from the construction activities and helping to protect the rural nature of the area. The landscape proposals include for hedgerow reinforcement and new native scrub along the Site's eastern and southern boundaries. Once established, this would help screen the development in views from this section of Public Footpath. As such, the LVA assesses the Magnitude of Change during Construction and at Completion as Medium, reducing to Negligible once the mitigation planting has had time to establish, at which point the proposals would become screened.
- 6.4.10 PRoW Checkley 5 runs along the route of Riverside Road, 540m north west of the Site. For the majority of its length to the north of the A50, the lane is either sunken below the adjacent arable fields or contained by roadside hedgerows which limit opportunities for views east across the intervening farmland between here and the Site. Where views are possible in the direction of the Site, layering of field boundary hedgerows and changes in landform screen direct views into the Site itself. The changes to the topography within the Site would help accommodate the BESS proposals and associated infrastructure. Once the landscape proposals have established, the additional planting proposed along the Site's western boundary would help reinforce the boundary hedgerow and provide greater screening of the BESS. Any views from this section of rural lane would be limited, with the immediate surroundings being unchanged as a consequence of the development. As

such, the LVA concludes that the Magnitude of Change during Construction, Completion and Establishment is negligible.

- 6.4.11 From a short section of the A50 taller vehicles travelling north would have glimpsed, oblique, transient views north towards the Site. However, given the layering of intervening field boundary vegetation, these fast moving views are likely very glimpsed and limited to winter months when the roadside vegetation and field boundary vegetation is more open. The landscape proposals include for additional reinforcement of the Site's eastern boundary, which once established would enclose the BESS infrastructure and screen any of these views from the A50. There are also limited views for vehicles from Riverside Road (route of Checkley 5 PRow).
- 6.4.12 The Site does not form part of the views into or out of a settlement and the development of the Site would consequently have no impact on such views.
- 6.4.13 Overall, it is considered that the proposal is consistent with criterion 1) of Policy DM3 as the LVA demonstrates that it would not result in prominent intrusion into the countryside, or have a significant adverse impact on the character or the setting of a settlement or important views into and out of the settlement.

'2) Supporting development which respects and enhances local landscape character and which reinforces and enhances the setting of the settlement as identified in the Landscape and Settlement Character evidence;'

- 6.4.14 The proposal includes for native planting that would screen the batteries from view and support the Landscape Planning Guidelines of the Settled Plateau Farmland Slopes Landscape Character Area as set out in the LVA. It is therefore consistent with criterion 2) of DM3.

'3) Supporting developments which conserve or enhance the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds;'

- 6.4.15 The Proposed Development would not impact any landscape features that make a meaningful contribution to biodiversity. The Site is currently cultivated and in agricultural use and consequently has extremely limited biodiversity value. It is contended that the proposed use of native woodland and shrub planting on the Site boundaries would enhance the biodiversity value of the Site and that the proposal accords with criterion 3) of DM3. The national requirement for 10% biodiversity net gain provision will be met on Site.

'4) Supporting opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape;'

- 6.4.16 The Proposed Development is completely reversible as it entails the stationing of modular battery containers on the Site. It can, and will, be paired with planting and screening on the Site. The combination of reversible development and mitigatory planting is wholly consistent with the objectives of sustainable building and the management of the landscape.

‘5) Ensuring that development does not adversely affect the wider setting of the Peak District National Park.’

- 6.4.17 The development is not sited within or adjacent to the Peak District National Park, which is approximately 10 miles away at its nearest point. There is no line of sight between the Site and the National Park. Consequently, the development would have no impact on the wider setting of the National Park.
- 6.4.18 It is therefore considered that the Proposed Development will meet the requirements of Local Plan Policy DC3.

Cumulative Landscape and Visual Effects

- 6.4.19 Native woodland blocks and field boundary hedgerows within the surrounding farmland provide containment and enclosure across the countryside to the north of the A50. Proposals for a Solar Array at Highfields Farm (SMD/2023/0197) are located approximately 700m north west of the Site alongside the A50 and to the north of Highfields Farm. Field boundaries and woodland blocks within and alongside the solar scheme would help screen and absorb the proposed solar array locally and provide clear separation between the proposals and the solar infrastructure to the north west.
- 6.4.20 This combined with the existing enclosure provided to the Site by woodlands and the A50 allows for low level features to be absorbed into this landscape, with limited wider appreciation. As such, no significant cumulative landscape effects are anticipated between the Scheme and the Solar Array at Highfields Farm, (SMD/2023/0197).
- 6.4.21 The A50 itself forms a well vegetated barrier across the landscape to the south that separates the countryside locally north and south of the highway. All remaining Cumulative Development schemes are located to the south of the A50, with all but SMD/2021/0662 (Screening request for proposed Solar Farm (sub 50MW)) being located between the A50 and the railway line. SMD/2021/0662 is located south of the railway line and adjacent to Dairy House Farm.
- 6.4.22 The A50 forms a well vegetated barrier across the landscape that separates the area of countryside within which the Scheme is located from that to the south within which the Cumulative Developments are located. Given this separation, development of the Scheme to the north of the A50 is not considered likely to lead to significant cumulative landscape effects with those Cumulative Developments to the South: SMD/2022/0160, SMD/2023/0197, SMD/2023/0594 and SMD/2021/0662.
- 6.4.23 No significant cumulative landscape effects are anticipated between the Scheme and the Cumulative Developments.
- 6.4.24 Cumulative Developments SMD/2022/0160, SMD/2023/0197, SMD/2023/0594 and SMD/2021/0662 are all located to the south of the A50, with no intervisibility between the Site or any of these Developments, as demonstrated on the Augmented ZTV (Figure 9). As such, there is not considered to be any ‘Combined’ visual effects associated with these Developments and the Scheme. PRow Checkley 12 and 14 pass to the east of Cumulative Developments SMD/2022/0160, SMD/2023/0197, SMD/2023/0594, with PRow Checkley

12 continuing north across the A50 and through Tea Leys farmstead. Depending on approach to mitigation, there would be an opportunity for users of these footpaths to experience some limited Sequential visibility of these Developments with the Scheme itself, however this would only be from views north of the A50 and with the Scheme seen at distance from the footpath. As such, effects would not be to a level at which they were considered Significant.

6.4.25 Proposals for the Solar Array (SMD/2023/0197) north of Highfields Farm are located approximately 700m north west of the Site. As demonstrated on the Augmented ZTV (Figure 9) there is not anticipated to be any intervisibility between the two schemes. As such, no significant cumulative visual effects are expected.

6.4.26 No significant cumulative visual effects are anticipated between the Scheme and the Cumulative Developments.

Summary and Conclusion

6.4.27 The Site is considered to be visually self-contained with there being limited views into or out of the Site as a result of both its location and the strength of existing boundary treatments and the boundary treatments of other fields that interrupt views from any of the possible vantage points. The Site's proximity to the A50 limits its role within the wider landscape as the A50 is noted as being a dominant and negative landscape feature and lies 300m to the south of the Site.

6.4.28 On the basis of this precedent and the assessment of the proposal against the considerations set out within Policy DC3 it is considered that the proposal would be acceptable in landscape and visual terms as the impact would be limited and readily mitigated. It is also considered to meet the requirements of Checkley Neighbourhood Plan Policy DES 3.

6.5 Heritage

6.5.1 Policy DC2 provides guidance on the protection of heritage assets. It aims to conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. Protection will be given to designated heritage assets and their settings and non-designated heritage assets as set out in the NPPF. Heritage Statements are required for all planning applications likely to affect heritage assets.

6.5.2 There are no heritage assets on the Site. The closest heritage assets are located within the settlement of Upper Tea. The closest listed buildings are the Grade II* listed Tea Hall and New Tea Hall Mill, and the Grade II listed '14, 14a, and 16 High Street which are located approximately 150 metres to the northeast of the cable route and 1.13km to the north of the proposed BESS Site. To the south of the Site away from the settlement of Upper Tea, the closest listed building is the Grade II Listed Blythe House which lies approximately 180m to the south-east of the southern section of the cable route and approximately 830m to the south-west of the proposed BESS site. This asset was

evaluated as part of an approved planning application for Lower Newton solar farm (application reference SMD/2014/0197).

- 6.5.3 In order to assess the impact of the proposal on designated heritage assets and in accordance with Policy DC2, a Historic Environment Desk-Based Assessment has been produced by Lanpro Services and is submitted as part of this planning application. This assessment draws together the available archaeological, historical, topographic and land-use information to clarify the significance and archaeological potential of the proposed Site.
- 6.5.4 The assessment has concluded that the Proposed Development will have no impact on the setting and significance of any designated heritage assets within the surroundings of the Site.
- 6.5.5 From an archaeological perspective, the available archaeological records, combined with the results of a geophysical survey, suggest that there is limited potential for the survival of prehistoric and Roman period remains within the Site. The Site is likely to have remained in agricultural use through the medieval and post-medieval periods and the geophysical survey identified anomalies related to agricultural activity including former field boundaries, modern ploughing, field drains and a pond. It is possible that buried remains relating to medieval or early post-medieval agriculture, such as ploughing or drainage features, could survive, but these are considered to be of negligible significance.
- 6.5.6 The proposals have been demonstrated to have negligible potential for adverse impact on surrounding heritage assets and therefore accord with Policy DC2.

6.6 Design Considerations

- 6.6.1 Policy DC1 provides that all development must be well designed and reinforce local distinctiveness. The supporting text for the policy locates good design within the wider matrix of sustainable development. Checkley neighbourhood Plan DES1 also requires that development be well designed and sustainable, and the layout should respond to views and landmarks.
- 6.6.2 The Site has been chosen to be located in an area that is not considered particularly sensitive in landscape terms as set out at 6.4 above. This is an integral part of the overall design process.
- 6.6.3 The nature of battery banks limits the design options as there is a requirement for operational functionality. In this context, it is considered that good design translates to low impact design.
- 6.6.4 The battery storage units are modular and designed to be as compact as possible. The modular design ensures that no more units need be installed than those required to meet the identified grid connection capacity.
- 6.6.5 The development would be screened by native woodland and shrub planting on the Site boundaries which would conceal it within the landscape and allow it to form part of the

surrounding field pattern. The proposed modular system is space efficient minimising the area needed for battery storage; this minimises the disruption to the established pattern of small fields with strong boundaries.

- 6.6.6 In conclusion, the design of the scheme minimises its impact on the surrounding landscape. The design of the scheme maximises the level of screening possible. It is therefore considered to meet the requirements of Local Plan Policy DC1 and Checkley Neighbourhood Plan Policy DES 1.

6.7 Noise

- 6.7.1 Policy SD4 seeks to protect people and the environment from noise pollution by ensuring proposals avoid potential adverse noise effects.
- 6.7.2 The BESS site comprises a substation transformer, battery storage units and inverters. The BESS site is located approximately 200 metres away from the closest residential property, Tea Leys Farm. The cable route to the sub stations will be below ground and will not emit any noise.
- 6.7.3 A dedicated Noise Assessment carried out by Tetra Tech has been submitted as part of this planning application. The Noise Assessment considers the potential noise generation from the plant associated with the Proposed Development, with respect to existing noise levels in the area.
- 6.7.4 Daytime and Night-time noise levels have been assessed using the assessment methodology contained in British Standard 4142:2014+A1:2019 *Method for rating and assessing industrial and commercial sound* and BS 8233:2014 *Guidance on sound insulation and noise reduction for buildings – Code of practice*.
- 6.7.5 The assessment identifies that when accounting for a worst-case scenario of continuous noise the rating levels from the proposed operations are predicted to be below the existing daytime and nighttime background noise levels at the closest sensitive receptors which include Tea Leys Farm. This indicates a low noise impact and falls within the No Observed Adverse Effect Level (NOAEL).
- 6.7.6 It should be noted that the assessment considers that all items of plant associated with the BESS are assumed to be always fully operational during the daytime and night-time periods. The development will not operate continuously, and similar developments tend to operate for short periods by National Grid, typically during the peak daytime periods and are rarely used during the night-time hours.
- 6.7.7 Therefore, from the perspective of noise the Proposed Development, when assessed on a worst case basis, is not expected to have an adverse impact on the amenity of any surrounding residents and complies with the requirements of Policy SD4 in so far as they relate to noise.

6.8 Lighting

- 6.8.1 Policy SD4 seeks to protect people and the environment from light pollution by ensuring proposals avoid potential adverse lighting effects.
- 6.8.2 No lighting is proposed as part of the Development and no light pollution will therefore result from the Proposal. Security cameras will utilise night vision technology to ensure site security in the absence of lighting. Security cameras will face into the Site in order to protect the privacy of nearby residents.
- 6.8.3 Therefore, for the reasons stated above it is considered that the Proposal will have no adverse impact on the amenity of surrounding residents or ecology and complies with the requirements of Policy SD4 in so far as they relate to lighting.

6.9 Air Quality

- 6.9.1 Policy SD4 seeks to protect people and the environment from air pollution by ensuring proposals avoid potential adverse impacts upon air quality.
- 6.9.2 An air quality assessment report has been undertaken by Tetrattech. It assesses the potential impact on air quality that would result in the event of a battery energy storage system (BESS) fire. Potential battery fire pollutant impacts have been assessed using dispersion modelling tools for the protection of human health and the health of workers.
- 6.9.3 The predicted BESS fire pollutant concentrations at relevant sensitive receptor locations have been compared against relevant UK Air Quality Standards for the protection of human health, British occupational exposure limits for the protection of the health of workers and or relevant impact assessment criteria (the Air Quality Category and the UK Daily Air Quality Index (DAQI)).
- 6.9.4 Baseline air quality conditions have been defined following reviews of Local Planning Authority air quality monitoring works, background concentrations published by DEFRA, as well as UK Defra monitoring networks.
- 6.9.5 The detailed modelling results have been presented in terms of the emitted pollutant Process Contribution (PC) and Predicted Environmental Concentration (PEC) ($PEC = PC + \text{Background Concentration}$). AERMOD modelling has been undertaken using the most representative meteorological dataset. The worst-case and highest predicted long-term and short-term PECs were compared to the appropriate Air Quality Objectives (AQOs) / Environmental Assessment Levels (EALs) or relevant impact assessment criteria.
- 6.9.6 As a BESS fire would be expected to last for a short period only, the fire incident would be unlikely to generate a long-term air pollutant exposure and therefore only short-term health impacts have been assessed.
- 6.9.7 The assessment results show that the short-term (1-hour mean) environmental concentration of Nitrogen Dioxide (NO₂) at one residential receptor location (Tea Leys Farm) is predicted to be above the relevant air quality objectives for the protection of human health. The predicted short-term environmental concentrations of NO₂ are below

the relevant UK air quality objective at all remaining receptor locations for the protection of human health.

- 6.9.8 The predicted short-term environmental concentrations of Carbon Monoxide (CO) at all residential receptor locations from a BESS fire incident are below the relevant air quality objectives for the protection of human health.
- 6.9.9 The predicted ground level 8-Hour mean and 15-min mean of Hydrogen Chloride (HCl) and Hydrogen Fluoride (HF) concentrations at the receptor locations are all below the relevant British occupational exposure limits. The short-term HCL and HF impact of a BESS fire at the receptors is sufficiently 'small'. The effect of pollutant impacts of HCl and HF in the case of a BESS fire on the receptors is insignificant.
- 6.9.10 The predicted short-term (24-hour mean) environmental concentrations of PM10 at the residential receptor locations from a BESS fire incident are all below the relevant air quality objectives for the protection of human health.
- 6.9.11 The assessment identified that two close receptors (Tea Leys Farm and Lower Tea Leys Farm located approximately between 270 m and 350 m to the fire) will have 'Moderate' UK Daily Air Quality Index for NO2. Tea Leys Farm will have a "Very High" UK Daily Air Quality Index (DAQI) for PM₁₀ and Lower Tea Leys Farm will have a "Low" UK DAQI for PM₁₀. Tea Leys Farm will have a "Very High" UK DAQI for PM_{2.5} and Lower Tea Leys Farm will have a "moderate" UK DAQI for PM_{2.5}. The two close receptors also have 'Moderate/Unhealthy for Sensitive Groups' Air Quality Category for PM2.5 concentrations under a worst-case scenario of a BESS fire lasting for up to 24 hours. All other nearby sensitive receptors will have 'low' UK DAQI and will fall into a 'good' Air Quality Category.
- 6.9.12 It should be noted that whilst it is not expected that a BESS fire would last for a long period of time, the assessment has utilised a worst-case scenario of pollutant emissions to determine the potential impact by assuming that a BESS fire would last up to 24 hours, in connection with the air quality standard of short-term averaging period for PM10 being measured as 24-hour mean. Therefore, a fire which lasted for less than 24 hours, for example only lasting for 1 to 3-hours, would result in much lower concentration levels measured as the 24-hour averaging period at sensitive receptors than those presented. For example,
- the short-Term (24-Hour Mean, 100th Percentile) Concentrations of PM10 at Tea Leys Farm and Lower Tea Leys Farm receptor locations would reduce from 'High' PM10 24-Hour UK daily air quality index to 'Low' PM10 24-Hour UK daily air quality index ' considering a fire would last 1 to 3 hours in reality;
 - the short-Term (24-Hour Mean, 100th Percentile) Concentrations of PM2.5 at Tea Leys Farm and Lower Tea Leys Farm receptor locations would reduce from 'Moderate' PM2.5 Air Quality Category to 'Good' PM2.5 Air Quality Category considering a fire would last 1 to 3 hours in reality; and
 - the short-Term (24-Hour Mean, 100th Percentile) Concentrations of PM2.5 at Tea Leys Farm and Lower Tea Leys Farm receptor locations would reduce from 'Very

High' PM2.5 24-Hour UK daily air quality index to 'Low' PM2.5 24-Hour UK daily air quality index ' considering a fire would last 1 to 3 hours in reality.

BESS Fire Action Plan

- 6.9.13 In view of the fact that (1) the predicted short-term NO₂ pollutant concentration at one residential receptor location is above the relevant air quality objectives for the protection of human health and (2) two close receptors will have 'Very High' or 'High' UK Daily Air Quality Index and will fall into a 'Moderate/Unhealthy for Sensitive Groups' Air Quality Category by the PM_{2.5} concentrations based on a worst-case scenario assumption of a BESS fire being lasting up to 24 hours, a fire action plan and safety measures will be implemented in the case of a fire.
- 6.9.14 The safety measures of the fire action plan will include:
- The site manager/fire safety representative will need to assess the fire location(s), wind directions and surrounding receptors. The site manager/fire safety representative will take appropriate actions accordingly. The actions to be taken include:
1. to inform any potentially affected residents, especially those that are located at downwind locations to the BESS fire;
 2. to cancel outdoor events and keep windows closed for any potentially affected residents, especially those that are located at downwind locations to the BESS fire; and
 3. to stop any farming activities and to move any farmers/workers within 500 m of the BESS fire to a cleaner air location. A cleaner air location would preferably not be downwind, and be at a distance greater than 500 m from the BESS fire."
- 6.9.15 Therefore, it is not anticipated there will be any significant effects on air quality resulting from the construction, operation or decommissioning of the Proposed Development following the implementation of the safety measures in the Fire Action Plan and the Battery Fire Safety Management Plan, details of which are provided below.

Outline Battery Safety Management Plan

- 6.9.16 While there are no specific policies within the Staffordshire Moorlands Local Plan relating to fire safety, Policy SD4 seeks to protect people and the environment from unsafe, unhealthy and polluted environments. Consultation has been undertaken with Staffordshire Fire and Rescue (SFRS) regarding the Proposal and preparation of an Outline Battery Safety Management Plan (OBSMP).
- 6.9.17 The OBSMP is included within this planning application and outlines measures to be undertaken in order to mitigate fire risk, these measures are listed below for clarity:
- Maintain two access points to enable access and evacuation with the blocking of both of these being highly unlikely.
 - Maintain appropriate hard standing and passing places on access roads to accommodate fire rescue vehicles in all weather conditions.

- It has been ensured that no occupied buildings are within 25 metres of the BESS Site with the nearest dwelling being located approximately 250 metres to the east.
- A distance of at least 6 metres between each BESS unit to enable access and prevent spread in the case of a fire event.
- No combustible vegetation to be located within 10 metres of the BESS units and these are to be located on concrete plinths with gravel separation areas.
- Water tanks will be installed with a minimum capacity of 228m³ (plus 10%) for use as fire suppression in the event of a fire emergency. The additional 10% has been agreed following consultation with SFRS.
- Signage will be positioned at the Site entrance detailing a Site layout plan and the contact details of key personnel.
- Deflagration venting to be fitted to the roof of the BESS units.
- An underground attenuation tank will be provided within the Site in order to store firefighting water runoff in the event of a fire incident to safeguard against water contamination.

6.9.18 These measures will help to ensure the safe operation of the Site and will mitigate fire risk.

6.10 Ecology, Biodiversity and Arboriculture

Ecological Assessment

- 6.10.1 Under Policy NE1 of the Local Plan development is to be controlled so as to protect and enhance the natural environment. There are ten requirements under the Policy which entail coupling applications for development with appropriate surveys, cognisance of the hierarchy of designated ecological sites, and implementation of a sequential approach locating development away from areas of sensitivity, inter alia.
- 6.10.2 An Ecological Impact Assessment (EcIA) of the Site has been undertaken by Clarkson and Woods Ecological Consultants. The assessment has been informed through a baseline UKHab survey and BNG condition assessment, as well as great crested newt (GCN) eDNA surveys of ponds carried out across 2022 and 2023. The report sets out the results of these surveys, identifies any potential ecological constraints associated with the construction of the BESS facility, and provides recommendations for avoidance, mitigation, and enhancement measures to reduce impacts on species or habitats that may arise as a result of the Proposed Development.
- 6.10.3 The site is not covered by any statutorily designated ecological sites, nor do any lie within 5km of the Proposed Development. "The Wing Drumble", an area of Ancient Semi-natural Woodland, lies approximately 0.6km east of the Site
- 6.10.4 Although the species is not known to be present in the surrounding landscape, the Site has some potential to support dormice within the hedgerow network. The sections of hedgerow being lost will be immediately replaced, ensuring impacts are temporary.

Dormouse surveys were considered disproportionate to the development and were therefore not considered necessary. Mitigation has been provided such that, in the event any dormice are present in the local landscape, there would be no impact to the population. All vegetation removal will be undertaken under a precautionary method of working. In the highly unlikely event that any dormice, or signs of, are encountered, a licence may need to be sought from Natural England.

- 6.10.5 A number of ponds were noted within 500m of the Site boundary, including the cable route. All accessible ponds were subject to a Habitat Suitability Index (HSI) assessment for GCN. Several ponds within 500m of the Site were sampled for GCN eDNA, with seven being confirmed as positive for GCN. Although several ponds were ruled out as being suitable to support GCN or from impacts resulting from the development proposals, due to the proximity of the positive ponds to the proposed works, and likelihood of GCN within the surrounding landscape, a licence will need to be sought. A conservation payment will be agreed and made under Naturespace's District Level Licensing (DLL) scheme. The Scheme includes ecological enhancement measures including woodland and scrub boundary planting and off-site habitat compensation measures to ensure that the scheme will have a significant net gain upon biodiversity within the local area. It should be noted that the off-site habitat lies within the same landholding as the proposed site and is a preferred location for habitat enhancement given its location between parcels of woodland. The provision of locally appropriate ecological enhancements will also ensure that the Proposed Development is consistent with the requirements of the NPPF Biodiversity Net Gain calculations were obtained using the statutory Natural England/DEFRA Biodiversity Metric and are set out below. The Scheme will adhere to the avoidance of impacts and mitigation/compensation measures outlined in the report and a Construction Environmental Management Plan (CEMP) can be agreed via a planning condition. The development will therefore comply with Policy NE1 and national planning policy in terms of ecological survey, protection and enhancement.
- 6.10.6 **Biodiversity Net Gain**
- 6.10.7 The NPPF requires the development to provide at least 10% biodiversity net gain (BNG) and Local Plan Policy NE1 seeks unspecified bio-diversity enhancement from new development. The implementation of the proposed Landscape Masterplan for the Site will provide a positive contribution to biodiversity within the Site.
- 6.10.8 The proposals incorporate on-site landscaping to effectively screen the Site with vegetation in combination with off-site BNG provision to meet the NPPF requirements. The on-site landscaping includes the provision of 0.19 ha of native scrub planting, 0.33 ha of native woodland planting, 60 m of infill native hedgerow and 266m of new native species rich hedgerow.
- 6.10.9 Although the River Tea will not be directly impacted by the development proposals, the cable route will run alongside (within 10m) the river for approximately 160m. As such, a Modular River Physical (MoRPh) survey to assess the condition of the River Tea, where it lies within 10m of the cable route, was undertaken on 10th February 2025.

- 6.10.10 Biodiversity Net Gain calculations were obtained using the statutory Natural England/DEFRA Biodiversity Metric. This shows that sufficient Hedgerow and Watercourse BNG units can be provided on site to attain a minimum 10% net gain through on-site mitigation alone. In order to ensure that the northern section of the BESS field can be retained as grazing pasture for continued use by the farming business, off site Habitat BNG units will be provided on land within the same landownership boundary as the Proposed Development. As a result of the combined on and off site BNG provision, the Proposed Development is anticipated to provide the following net gains:
- 42.32% net gain in habitat Units
 - 24.98% net gain in hedgerow units; and
 - 16.42% gain in River Units.
- 6.10.11 This is significantly in excess of the NPPF requirement for 10% BNG provision. The Proposed Development therefore also complies with the requirements of Local Plan Policy NE1 through the provision of biodiversity enhancement. A S106 agreement will be advanced to secure the offsite BNG provision.
- 6.10.12 **Arboriculture**
- 6.10.13 Policy NE2 seeks to protect existing trees, woodlands and hedgerows, in particular, ancient woodland, veteran trees and ancient or species rich hedgerows from loss or deterioration.
- 6.10.14 A BS5837:2012 Tree Survey and Arboricultural Impact Assessment have been undertaken by Lanpro and are submitted as part of the planning application. The report contains a Tree Survey Schedule, Tree Constraints Plans illustrating the locations of surveyed trees and their assigned category (A,B,C and U) as well as canopy spread and Root Protection Areas and Tree Impact Plans illustrating tree removals, pruning and root impacts of the development.
- 6.10.15 There are no ancient woodlands, veteran trees or ancient or species rich hedgerows within the Site. A total of 98 individual trees, 30 groups of trees and 25 hedgerows were recorded. Three category C Hawthorns and one category C Ash are required to be removed to facilitate the development. In addition, a total of 51m of category C hedgerow is required to be removed in modest 5m or 9m portions in 7 locations to allow for the installation of the cable route. This will be temporary in nature, as removed sections of hedgerow will be immediately transplanted, rather than being replaced with whips. This will ensure that the baseline hedgerow condition remains the same immediately post-development. Approximately 150m of hedgerow planting is proposed, which will mitigate for the loss of this habitat and provide an enhancement to the Site. Any required construction work within close proximity to remaining trees and hedgerows will be mitigated throughout the construction phase by implementing appropriate working practices or establishing securely fenced buffer zones that will remain free from development.

- 6.10.16 The Proposal therefore complies with the requirements of Policy NE2 as it does not require the removal of, or result in the deterioration of any ancient woodland, veteran trees and ancient or species rich hedgerows.

6.11 Transport and Highways

- 6.11.1 Local Plan Policy T1 promotes and supports development which is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development. It seeks to ensure that major development is located in areas that are accessible by sustainable modes.
- 6.11.2 Paragraph 115 of the NPPF states that: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation would be severe, taking into account all reasonable future scenarios.”*
- 6.11.3 Vehicular access to the proposed BESS Site is to be achieved via two private access roads. Primary access to the Site will be achieved from the southeast via an existing private access track leading from Leigh Lane, located directly adjacent to the A50. This benefits from a hard standing bound surface. Drawing 2111-031-SP01-C provides swept path analysis and visibility splays of the existing access from Leigh Lane. Swept-path analysis of a 16.5m articulated vehicle accessing and egressing the Site in a forward gear is shown. This is the largest general vehicle that will be required to deliver equipment to the Site. Drawing 2111-031-SP01-C shows that minor works will be undertaken to widen the bell mouth of the access to accommodate HGV movements associated with the construction phase.
- 6.11.4 Secondary access is proposed from Draycott Road via an existing private access track and will provide access to the sub-station approved under application reference SMD/2023/0594. This is an approved access under that planning permission. The two points of access will be used for construction and occasional maintenance thereafter.
- 6.11.5 The layout of the proposed BESS area has been designed so that it contains a perimeter track around the BESS. This track will allow emergency fire tenders to access the BESS from two directions in the event of a fire. Drawing 2111-031-SK01-B shows the site access layout within the proposed BESS area.
- 6.11.6 The identified Cable Route Corridor runs north from the Proposed BESS area to the electricity distribution site on Cheadle Road in Upper Tea and south to the recently approved electricity substation (Ref: SMD/2023/0954) located adjacent to the railway line, south of the A50. Horizontal Directional Drilling (HDD) will be used to route the cable beneath the A50 and avoid any impact on the strategic highway network.
- 6.11.7 The construction of the cable route on roads between the Site and the existing substation on Cheadle Road, will be installed in sections, with rolling traffic management avoiding road closure. This will be agreed with the Highway Authority ahead of construction. Prior to these works being undertaken, all appropriate licences will be obtained, including a

Section 50 licence to agree traffic management with the Highway Authority. The local community will have early notice of the exact works and their location a minimum of four weeks ahead of commencement via flyers, signage and online notices.

- 6.11.8 The proposals are not anticipated to result in significant vehicle movements post the 12-to-18-month construction phase. With access only required intermittently for routine maintenance which is only anticipated to be no more than 1-2 visits per month. During the construction period it is anticipated that there will be a total of 306 deliveries which will average approximately one delivery per day assuming a 12-month construction period.
- 6.11.9 There is likely to be a small peak in deliveries early in the construction process for site set-up and then again when the electrical equipment (BESS units) is ready for installation. There will be no more than 10-15 deliveries per day by HGV during this period which will last approximately four to six weeks.
- 6.11.10 There will be a single abnormal load associated with the delivery of the substation transformer, this delivery will be managed by a specialist haulage company with appropriate licensing and traffic management in place. In addition to delivery vehicles, there will be a number of LGV movements necessary to transport construction workers to and from the Site. This is not anticipated to exceed 10 LGV arrivals per day, with shared transport being prioritised.
- 6.11.11 Further details are contained within the CTMP submitted as part of this application. The CTMP contains a package of mitigation measures to minimise the effect of construction traffic on the surrounding transport network. In the event of planning permission being granted, it is anticipated that a planning condition will require the submission of a detailed CTMP and its approval prior to construction commencing.
- 6.11.12 In summary, the Site is in a suitable location for a BESS development in terms of transport. The local highway network within the vicinity of the Site is suitable for HGVs which will help facilitate the movement of equipment to the Site during the construction phase. Neither the construction phase nor operational phase of the development will have a material effect on the local transport network. Notwithstanding this, a CTMP will be implemented to minimise the effect of construction vehicles on the local highway network. The Proposed Development is therefore acceptable in transport planning terms. It accords with Local Plan Policy T1 and should be approved in accordance with paragraph 115 of the NPPF.

6.12 Flood Risk, Drainage and Firewater Attenuation

- 6.12.1 Local Plan Policy SD5 seeks to direct development to areas with the lowest risk of current and future flooding. All developments will require a site-specific flood risk assessment in accordance with NPPF policy. All applicable developments should incorporate sustainable drainage measures to reduce flooding from surface water run-off and contribute to on-site flood alleviation. Where appropriate suitable measures to deal with

surface water arising from the development proposal will be required. Policy DC1 seeks to ensure that existing drainage, wastewater and sewerage infrastructure is available and where necessary enhanced to enable development to proceed.

Flood Risk

- 6.12.2 In their pre-application response reference PAD/2024/0028 the LPA highlighted that the BESS Site is located wholly within flood zone 1 and is therefore at very low risk of flooding from rivers or the sea. However, a small section of the cable route passes through an area of flood zone 2 and 3 as it enters the settlement of Upper Tea to the north of the Site. The pre-existing substation to the north and pre-approved substation to the south are also designated at an increased risk of flooding.
- 6.12.3 In line with Policy SD5: Flood Risk, a dedicated Flood Risk Assessment and Drainage Strategy carried out by Lucion has been submitted within this application. The report concludes that whilst parts of the cable route are indicated to have an elevated risk of flooding at ground level, given the cabling will be underground, these are not considered to be impacted by this. Parts of both substations into which the Development will connect are also indicated to be at elevated risk of flooding; however, the northern substation is already in existence and the southern substation has already been consented under a separate planning permission.
- 6.12.4 In summary, the flood risk to and from the BESS from all sources is considered to be low. Given the cable routes are entirely below ground and in the absence of data illustrating shallow groundwater levels, the cable routes are not considered to be at an elevated risk.
- 6.12.5 Mitigation is not specifically required with respect to fluvial flood risk, but in accordance with the FRA report, there will be no increase in ground levels as a result of the installation of the underground cable routes and the cables will be fully cased and waterproofed to prevent any ingress of water. On this basis, the Development is considered to comply with the requirements of Policy SD5 insofar as they relate to flood risk.

Drainage

- 6.12.6 There is no requirement for any staff facilities at the Site and therefore no need for any foul drainage connection.
- 6.12.7 In terms of surface water drainage, the Drainage Strategy first considered the use of soakaways in accordance with the drainage hierarchy set out at paragraph 056 of the NPPG: Flood Risk and Coastal Change. Due to the Site being underlain by bedrock deposits of Mercia Mudstone formation which are not of high water-bearing capability, the use of soakaways was discounted.
- 6.12.8 Therefore, surface water runoff will be discharged to an unnamed land drain located in the south of the Site at a rate of 3.44 l/s. Surface water runoff up to the 1 in 100 year plus 30 % climate change allowance event will be attenuated on Site. A total attenuation volume of 433.2 m³ will be required to achieve the discharge rate and will be provided in the form of gravel subbases located around the BESS. A drainage plan is provided at Appendix A to the Flood Risk Assessment which illustrates this.

- 6.12.9 The Proposal therefore complies with Policy SD5 and DC1 as the Site has applied the NPPF Drainage hierarchy and includes SUDS measures as far as is achievable on the Site and the proposed drainage strategy is suitable to deal with surface water arising from the development proposal.

Firewater Attenuation

- 6.12.10 A Firewater Risk Appraisal Report prepared by Lucion is submitted as part of the planning application. The report has been produced to develop a solution to address potential environmental pollution risks that could arise were a fire incident to occur at the Site, notably risks associated with the non-containment/potential loss of fire water from the Site.
- 6.12.11 If a fire incident were to occur, contaminated firewater can affect the environment through direct run-off into a waterbody, soaking away into the ground or by entering drainage systems. These systems may then transport pollutants in the firewater into rivers, lakes, estuaries and the sea, groundwater, or to sewage treatment works. Introducing a heated liquid into a watercourse is also a form of pollution because it may cause de-oxygenation or kill aquatic organisms.
- 6.12.12 The proposed surface water drainage system is designed to contain water from the BESS installation area, with up to 470.2 m³ to be held in lined gravel areas of the Site with an additional attenuation tank of 16 m by 10 m by 1 m providing up to 160 m³ for firewater storage. In total 630.2 m³ of water storage across 4 no. cylindrical tanks will be provided. It is proposed to store the water behind penstock valves to ensure that no water will leave the Site / enter the land drainage network via the drainage system during a fire event. The proposed drainage system will have capacity to store firewater and surface water run-off generated through the design event. The Proposal therefore complies with Policy SD4 which seeks to protect people and the environment from unsafe, unhealthy and polluted environments.

6.13 Coal Mining Risk Assessment (CMRA)

- 6.13.1 While the BESS Site is not located in a Coal Mining Reporting Area (CMRA), 1.5 km of the northern section of the cable route and the existing sub-station within Upper Tea are subject to the Coal Mining Reporting Area within and around the settlement of Upper Tea. However, no sections of the Site are located within the Development High Risk Area, and the nearest recorded mine shafts and shallow workings are located approximately 1.5km north of the most northern point of the cable route and the substation within Upper Tea.
- 6.13.2 Therefore, based on the evidence outlined above no shallow coal seams are present beneath the proposed route/ electricity substation and given the presence of a fault between the Site and the former collieries to the north, it is unlikely that workings of any coal seams beneath the Site have been undertaken. The Site is therefore unlikely to be impacted by ground movements induced by coal workings and on this basis the risk to the

development is considered to be negligible and a detailed Coal Mining Risk Assessment is not considered necessary to support the development scheme. Further details can be found within the Coal Mining Risk Assessment (CMRA) Letter Report submitted within this application.

6.14 Planning Balance

6.14.1 The Proposed Development is considered to comply with policies of the development plan when taken as a whole and therefore should be approved without delay, as per Paragraph 11 (c) of the NPPF.

6.14.2 Should the Council consider the tilted balance to be engaged, we have undertaken a planning balance exercise below regarding the benefits and harms associated with the Proposed Development as set out below:

Benefits

- Provides essential storage capacity with energy balancing capabilities for the National Grid which is fully in accordance with the Governments objectives of achieving net zero by 2050 as set out at paragraph 161 of the NPPF.
- Compliant with the requirements set out in Policy SD2 of the Local Plan which supports the provision of renewable energy developments.
- Biodiversity Net Gain provision significantly in excess of the statutory requirement of 10%.
- Proposed BESS site located wholly on Grade 4 agricultural land as demonstrated by an agricultural land survey.

Harms

- Limited landscape and visual impacts that can be readily mitigated as set out at Section 6.4 above and in detail within the submitted Landscape and Visual Assessment.

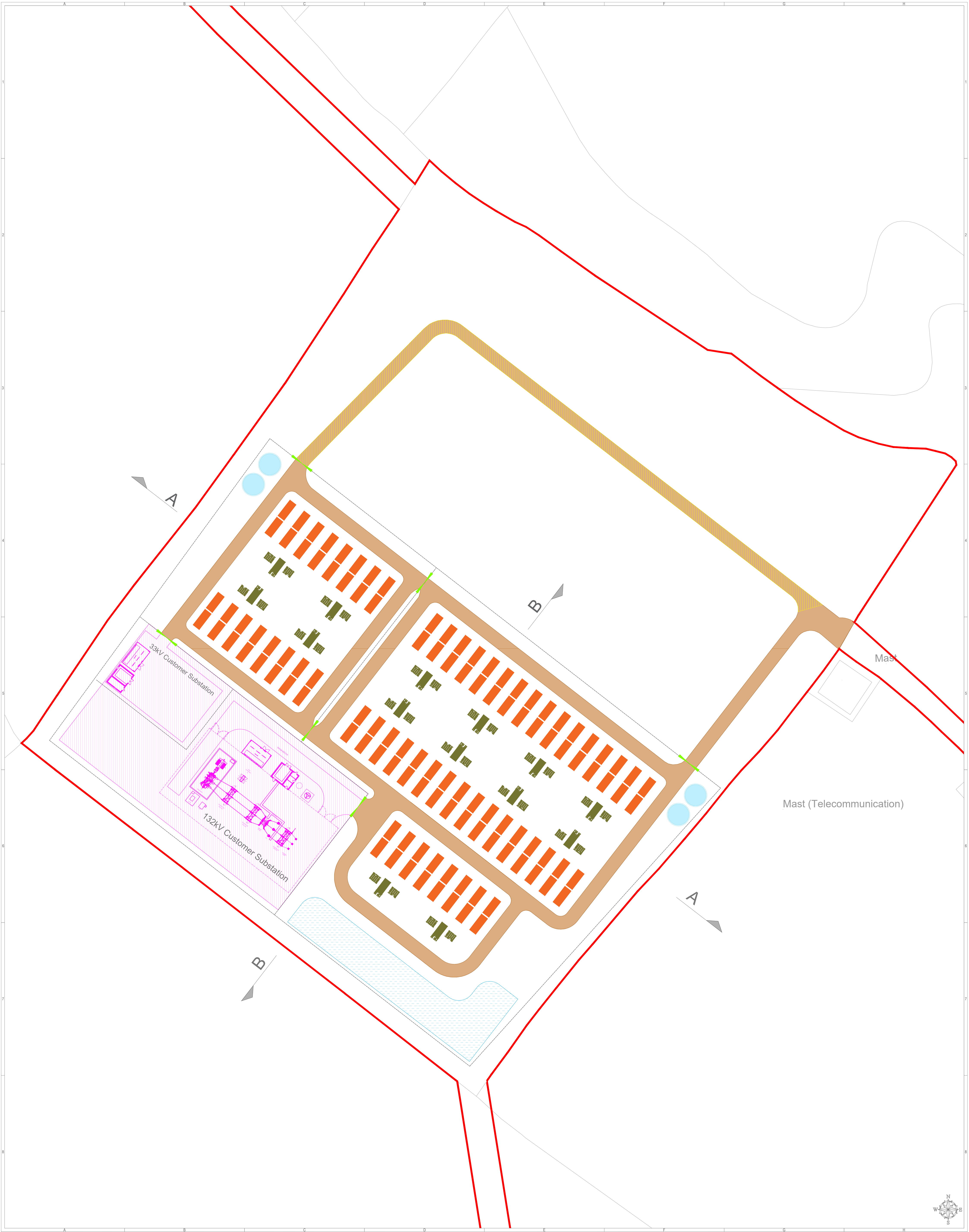
6.14.3 The Proposed Development is therefore considered to comply with the development plan as a whole and the benefits of the Proposed Development are significant and clearly outweigh the harms. It is therefore strongly contended that planning permission should be granted.

7 Conclusion

7.1 Summary

- 7.1.1 This application proposes the development of a battery energy storage facility and associated infrastructure, access and cable route on land at Tea Leys Farm, Tea Leys, Leigh, Stoke-on-Trent, Staffordshire.
- 7.1.2 The purpose of the Development is to assist in balancing of the National Grid through provision of energy storage capacity. When there is an excess of renewable energy being produced from e.g. solar during the day, or wind, the energy can be stored on the Site until it is needed, at which point it will be drawn upon by the National Grid. This is an essential component of the UK's journey towards achieving net zero.
- 7.1.3 Paragraph 161 of the NPPF states that the planning system should support the transition to net zero. The site has been assessed as a suitable location for battery energy storage as set out in Section 5, while leaving minimal impact on residential properties within the locality and the environment.
- 7.1.4 Paragraph 168 states that when determining planning applications local planning authorities should give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.
- 7.1.5 The principle of the Proposed Development in this location has been clearly established through the Site Selection process detailed in Section 5 and the consideration of and demonstrated compliance with NPPF and local planning policies as set out in Section 6.
- 7.1.6 The Site comprises Grade 4 (not best and most versatile) agricultural land as confirmed by on-site soil testing and reported within the Agricultural Land Classification Report by LRA which accompanies the application and is not in an area at risk of flooding according to Environment Agency flood mapping, as reported within the Flood Risk Assessment. There are no suitable and available brownfield sites that could accommodate the Development elsewhere.
- 7.1.7 The Proposed Development will result in significant biodiversity net gain through a 42.34% net gain for area-based habitats, a 24.98% net gain for linear habitats, and a 16.42% net gain for watercourse units.
- 7.1.8 The Development has been demonstrated to comply with the relevant policies contained within the Development Plan and with NPPF policy supporting the transition to net zero. We therefore request that this planning application is approved.

8 Appendix 1 – Site Layout Plan



General Legend			
	Application Boundary		
	Battery Energy Storage Unit		
	Conversion Unit		
	Security Fence		
	33kV/132kV Substation		
	Gate		
	BESS Maintenance Track		
	Secondary Point of Access to meet NFCC Guidance		
	Water Tank		
	Space for Water Attenuation		



Project:	Tean Leys BESS
Project Location:	Tean Leys Farm, off Leigh Lane, Tean Leys, Leigh, Staffordshire, ST10 4NS
Project Ownership:	Tean Leys Energy Storage Ltd.
Document Title:	BESS Site Layout Plan

Sheet Format:		A1 "841 x 894"	Scale:	1:500
Document Amendments:			Comments:	
Company:	Island GREEN POWER Island Green Power UK Limited Unit 25.7, Coda Studios 189 Munster Road, London SW6 6AW			

