

Declan Cleary
Staffordshire Moorlands District Council

29th July 2025

Ref. EP-24-094

Dear Declan

Re. PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT NEW HOUSE FARM, LUZLOW LANE, BAGNALL, ST9 9JZ.

1. With regards to the above planning application, please find enclosed the following documents:

- ES Figure 1.1 - Site Location Plan (ref. LZL-BESS-001.4 Rev 2)
- ES Figure 1.2 - Proposed Site Plan (ref. LZL-BESS-001.5 Rev 5)
- Ecology Statement ref. 81-730-L2 (E3P)
- Biodiversity Metric Report ref. 81-730-R2-4 and Metric Calculation Tool (E3P)
- Noise Assessment ref. 103147 V3 (Miller Goodall)
- Landscape and Visual Impact Assessment Rev A (LVIA Ltd.)
- LVIA Memo (dated 14.07.025, LVIA Ltd).
- Landscape Plan (ES Figure 1.5, Rev F)
- Drainage Strategy Report ref. P16021-GOO-XX-XX-RP-C-0500 P05 (Goodson Associates)
- Cut and Fill Analysis ref. P16021-GOO-XX-XX-DR-C-0540 P02
- Proposed Levels ref. P16021-GOO-XX-XX-DR-C-0542 P02
- Sections ref. P16021-GOO-XX-XX-DR-C-0543 P02
- Proposed Drainage Schematic ref. P16021-GOO-XX-XX-SK-C-05 P02
- ES Chapter 7 Addendum (LTP)
- Transport Statement July 2025 Update (LTP)
- Construction Traffic Management Plan July 2025 update (LTP)
- Clarifications on Cable Route (Energy Planning by PWA Planning)

2. The documents submitted herein are provided in response to various consultee comments, neighbour responses and discussions with planning officers at Staffordshire Moorlands District



Council (the Council). In brief, amendments have been made to the proposed development in response to these comments, and the proposals have been reassessed by the applicant's team of technical specialists.

Proposed Amendments

3. It is proposed that the compound which will accommodate the proposed development is moved to the west of the location as originally submitted. The main reason for the relocation is to avoid impacts on an existing hedgerow which is located on site and which would have required removal as part of the originally proposed location. The compound has moved southwest by c35m. Additionally, the red line planning application boundary has been updated to reflect the change, and to encompass the land to the south of the compound which will be utilised for biodiversity net gain, and which was previously included as land within the blue line for 'off-site' mitigation.
4. Given the relocation of the compound, additional work has been undertaken to consider the impacts on site levels and the earthworks that would be required to provide a level platform for development. This is covered in more detail below.
5. For the avoidance of doubt, the proposed development as amended involves the same equipment proposed within the compound itself within the same configuration; the only change is that the compound has been moved west in its entirety.
6. The following matters have been addressed in the amended information pack:

Ecology and Biodiversity

7. In discussions with officers, there was some concern about the loss of hedgerow associated with the originally submitted proposals, with the hedgerow located close to the east of the compound needing to be removed to allow for development. In moving the compound to the west, this hedgerow has now been avoided almost in its entirety with only a short section of hedgerow H2 (c12m) to be removed to accommodate the access track through to the compound. This will be compensated for by the proposed lengths of hedgerow which form part of the landscaping proposals.
8. The revised proposals will result in a biodiversity net gain of 4.34 habitat units (25.10%), 3.68 hedgerow units (345.76%) and 0.15 in watercourse units (15.00%). A significantly higher net gain will therefore be achieved as a result in relation to habitat units, hedgerow units and watercourse units than is required by the Environment Act 2021, with the 10% target significantly exceeded.
9. In addition to a revised BNG Assessment, the project ecologist, E3P, has also provided a response directly to the queries previously raised by the Staffordshire Wildlife Trust who are the statutory ecology consultee for this application.

Noise

10. A revised Noise Assessment has been provided. This takes account of the revised layout submitted herein and responds directly to the comments made by the Council's Environmental Health Officer. The revised assessment includes additional context for the baseline assessment,



in particular the resulting noise levels from operation of the plant has been considered in relation to absolute limit criteria in BS8223. The recommended mitigation, i.e. maximum plant levels specified for final plant selection has been determined based on the predicted rating level matching the background. Also, following comments from the EHO at SMDC, a low frequency noise analysis has been undertaken to determine whether disturbance due to low frequency noise resulting from proposed operations is likely.

11. The EHO had expressed concern regarding the way in which the required reduction in plant noise is to be achieved. The submitted report makes it clearer that this is to be achieved via quieter plant selection and now recommends that the pre-commencement noise assessment be stipulated in a suitably worded planning condition.
12. With regards to cumulative noise, an indicative cumulative impact assessment has been undertaken based on a review of proposed battery energy schemes and noise reports associated with the respective planning applications, where available. The assessment considers that, were local applications sites to be granted permission, the potential cumulative effects would likely be negligible to minor.
13. The assessment of low frequency noise has found that resultant internal sound levels will be significantly below the stringent design criteria. Low frequency noise should not cause disturbance, and there is unlikely to be an audible low frequency hum.
14. Based on the assessments undertaken and provided the recommended acoustic design and any associated mitigation measures are implemented, the assessment concludes that the impact of noise emissions from the proposed development is likely to be low. As such, and with the reassurance of the recommended condition for a pre-commencement noise assessment, the proposed development should be considered acceptable in terms of noise emissions.

Landscape and Visual Impact

15. The Council commissioned a review of the submitted Landscape and Visual Impact Assessment (LVIA), with comments provided by Ryder Landscape Consultants (RLC). The LVIA (produced by LVIA Ltd) has subsequently been updated to account for the changes made to the proposals and address the comments from RLC. In addition, a Memo has been provided by LVIA Ltd. which responds directly to the consultation comments and references where these have been addressed in the updated report. Amendments have also been made to the landscaping proposals and are submitted herein.
16. As a result of the changes to the proposed development, it has been assessed that a partial loss of key landscape elements and the introduction of elements that may be prominent but may not be considered substantially uncharacteristic will occur. Consequently, the significance of landscape effect for the operation of the proposal is assessed to be moderate adverse (i.e. not a significant change).
17. After 15 years and with a successful mitigation strategy, a reduction in the magnitude of landscape effect will occur. With a medium sensitivity combined with a small magnitude of change consequently, the significance of landscape effect for the construction of the proposal is



assessed to be minor adverse (i.e. not a significant change). These findings are the same as those found in relation to the original proposal.

18. With regards to visual impacts, the LVIA concludes that the site occupies a relatively small visual envelope mainly on account of the surrounding undulating landform and mature vegetation. With regards to identified visual receptors, the assessment concludes that the road users of Luzlow Lane to the east of the site would generally experience a noticeable change but would be experienced from moving vehicles and for a relatively short section of the road. It further concluded that users of footpath 37 to the south-west would experience a noticeable change where gaps in the intervening vegetation allow.
19. Residential receptors are considered to be of high sensitivity but have no right to a view in planning terms. The change that they are subject to will be limited to their property and will not be publicly accessible so less people will experience the change. There is likely to be a limited visual change to a handful of residents from a single façade of their property. Local residents with open views of the site from the primary living space of their property are accepted as being highly susceptible to changes within their views. Local residents with no views of the site from their primary living space, who live in a dwelling where the views are focussed in a different direction to the site, or whose views of the site are partially screened by existing houses or vegetation, would have a lower susceptibility to changes within the site. Although some adjacent properties accessed from Luzlow Lane to the north east and to the south at Little Armshead Farm have partial views of the site, their main elevations do not overlook the site.
20. In terms of overall visual effects, these would result in a significance that can be assessed as major/moderate adverse (i.e. a significant change) as a worst case. This is from Viewpoint 6 that sits to the south-west of the proposed site boundary. The grouped viewpoints that represent Luzlow Lane to the east and south-east (viewpoints 2, 3 and 4) will be subject to moderate adverse levels of change (i.e. not a significant change). The remainder of viewpoints will also not be subject to a significant level of change. The residual impact assessment will be reduced from all viewpoints as a result of a successful mitigation strategy. As a worst case, viewpoint 6 is assessed to be subject to a moderate adverse residual visual effect (i.e. not a significant change).
21. For both landscape and visual effects, the introduction of the proposal into the cumulative baseline would see limited or no change in effects.
22. The above findings are consistent with those of the original assessment.

Drainage and Site Levels

23. As a result of the movement of the compound to the west to avoid hedgerows, the information with regards to site levels has been updated. This includes Cut and Fill Analysis (ref. P16021-GOO-XX-XX-DR-C-0540 PO2), Proposed Levels (ref. P16021-GOO-XX-XX-DR-C-0542 PO2) and Sections (ref. P16021-GOO-XX-XX-DR-C-0543 PO2). The Drainage Strategy Report has also been updated.



24. The result of moving the compound to the west is that the cut and fill volumes associated with the proposed development have changed. The net cut (and therefore soil removal) required is 3,127m³, whilst the approximate site strip volume is 4,664m³. The key implications of these volumes are with regards to the vehicle movements required to transport the excess material off site. These matters are covered below under the Traffic and Transport heading and in the supporting documents associated with that topic.
25. The updated drainage strategy report confirms that surface water will be dealt with via a new traditional gravity pipe network servicing any new areas of hardstanding. A porous construction base will provide SuDS treatment for run off from areas of hardstanding, access and external working. A detention basin and 1 No vortex controls will be utilised to attenuate surface water flows to the equivalent pre-development greenfield run-off values, and a final surface water connection to outfall to the local watercourse within the site boundary will be made. This is consistent with the drainage strategy as originally proposed and will allow for surface water run-off at the agreed discharge limit with attenuation features tested for 1: 100-year rainfall events with an additional uplift of 30% for climate change resilience as required by guidance.
26. It should be noted that the water tanks required as part of the fire water management strategy for the proposed development have been relocated slightly from the positions originally suggested in the submission as these previously overlapped with some of the gradients created by the earthworks.

Traffic and Transport

27. Chapter 7 of the ES covered the likely impacts of the proposed development associated with Traffic and Transport. An addendum to the ES chapter has been provided together with updated versions of the Transport Statement (TS, Appendix 7.1) and Construction Traffic Management Plan (CTMP, Appendix 7.2) to account for the additional cut and site-strip volumes of materials that need to be removed from the site.
28. Given the increased volumes, the proposed development is expected to generate an average of 26 two-way daily HGV movements during the first three months of the construction phase when the excess spoil is removed. The daily HGV movements will reduce considerably for the remaining months of construction. It is expected that the maximum number of construction staff on-site will vary subject to the construction schedule, with a maximum of 10 staff expected to be working on site at any one time. There is no increase in operational phase traffic.

The construction phase for the proposed development and committed developments, and any associated impact, is temporary until the scheme has been fully constructed. It is expected that the construction of the proposed development and local committed developments would be spread over time, rather than condensed into an intensive construction period, however for robustness it has been assumed that all peak construction periods occur simultaneously. The construction period of the proposed development and committed developments would result in a traffic flow increase of below 10% on all links, with a maximum of 9% expected on Rownall Road. The existing flows on Luzlow Lane are likely due to be lower than the utilised baseline traffic flows. Even if baseline traffic flows were half of those predicted (1,796), the impact of the construction period would still be well below 10% (2.6%).



29. The operational phase traffic levels remain unchanged, as outlined in Table 7.10 of the ES Traffic Transport Chapter.
30. The addendum submitted herein concludes that the slight increase in daily construction traffic does not materially impact the assessments and conclusions presented in ES Chapter 7 Traffic and Transport, with no increase in vehicle movements associated with the operational phase.

Cable Route

31. In discussions with the LPA, queries were raised with regards to the area of search used in the Alternative Site Assessment, which covers land within 2km of the point of connection of the proposed development at Cellarhead Grid Supply Point. A note titled Clarifications on Cable Route has been provided which provides further information on the justification for the 2km area of search, focusing on the grid offer which the applicants have, which allows for a 1.5km cable route between Cellarhead and the application site.

Other Matters

32. We are aware that a large number of objection letters from local residents have been received by the Council on this application. These have been reviewed and it is considered that the vast majority have been responded to in the submission of information already with the Council, or within the revised information submitted herein.
33. The following topics have been raised as particular areas of concern.
34. ***Impact on wildlife/ecology/biodiversity*** - the proposed development has been amended as described above to include retention of a long section of hedgerow which runs to the east of the proposed compound. Whilst Staffordshire Wildlife Trust had some comments on the development, these have been fully addressed by the ecologist for the application. Additionally, the BNG Metric has been updated which demonstrates that there would be a significant uplift in biodiversity, substantially above the 10% statutory requirements.
35. With specific regards to Wetley Common Moor which was mentioned by several respondents, this is a SSSI located approximately 140m southwest of the site. To ensure the designated site is not negatively impacted by the development, all best practice guidance relating to pollution will be adhered to. This will include best practice use of refuelling machinery to avoid fuel spills. Site drainage will need to be considered to ensure that no highly silted or polluted run-off from the site workings will enter the ground. Natural England are the statutory consultee regarding Wetley Moor Common and have no objections to the proposed development. It is not anticipated they will have any further comments to make on the amendments.
36. ***Proximity to homes/ impacts on residents / noise*** - there are no statutory set back distances involved in the development of BESS, however for practical reasons, such schemes tend to be separated from nearby residential properties as far as possible. The updated noise assessment submitted herein provides comprehensive noise information and demonstrates that, with the imposition of suitably worded planning conditions, impacts in this respect would be low.



BESS technology is developing rapidly and it is the case that the noise conditions would ensure that the amenity of local residents is protected.

37. It is acknowledged that views of the site may be available from some nearby properties, however it should be noted that residential dwellings have no right to a view in planning terms. The change that they are subject to will be limited to their property and will not be publicly accessible so less people will experience the change. There is likely to be a limited visual change to a handful of residents from a single façade of their properties, however it is considered that this is outweighed by the benefits associated with the proposed development. Additionally, the landscaping scheme, once established will limit views further.
38. ***Loss of greenspace/open space/ inappropriate development in the Green Belt*** - the justification for the proposed development within the Green Belt has been set out in detail in the submitted Planning Statement. In brief, it is our view that the proposals do not constitute inappropriate development in the Green Belt, rather we consider that the site is a grey belt site and the type of development proposed is subject to a demonstratable need. If this view is not shared by the LPA, we are of the view that very special circumstances exist to justify the development, with any harm by reason of inappropriateness and any other harm outweighed by the benefits of the proposed development and other factors, including the locational constraints associated with BESS development.
39. The site itself is in private ownership. It does not constitute formal open space and whilst it is a greenfield site, this in itself does not preclude development.
40. ***Loss of agricultural land/impact on surrounding farmland*** - the site comprises grade 3b agricultural land, which is not classed as 'best and most versatile'. Given the scale of the proposed development, which is limited, and this grading, the impacts on loss of farmland are minor. As above, the site is in private ownership and it is the decision of the landowner to diversify the land use for this purpose. No impacts are anticipated on surrounding farmland as a result of the proposed development.
41. ***Fire risk*** - the submission has been supported with an Outline Battery Safety Management Plan (OBSMP) to define the proposed safety strategy, requirements and processes necessary to meet derived safety objectives and to set a level of safety performance that the installation is to be measured against. Section 6 of the OBSMP provides a table of the requirements of the National Fire Chief Council Planning Guidance for Fire and Rescue Services, which is referred to in the PPG on Renewable and Low Carbon Energy. This includes 14 key points against which the scheme is measures. On all points, the proposed development is considered compliant. Additionally, the applicant's fire safety consultant has been liaising directly with the Staffordshire Fire and Rescue Service on matters of fire safety and will continue to do so as the project moves forward.
42. ***Potential for water contamination*** - it is understood that the main concern with regards to water contamination relates to the potential for water used to tackle a potential fire then entering the ground and polluting nearby watercourses. It should be noted that in the unlikely event of a fire, and if it was deemed that water should be used to suppress the fire, an automatic penstock



will be utilised within the drainage network, before the SuDS basin, to retain the runoff for testing in the event fire safety measures are activated.

43. Matters relating to pollution prevention are also covered in the submitted Preliminary Ecological Appraisal with specific regard to the Wetley Moor SSSI, with a number of measures set out to protect this designated site. It is anticipated that these will be conditioned on any permission granted.
44. **Light pollution** - the proposed development would not be lit as a matter of course; this is an unmanned development, and any maintenance works once the site is operational would be carried out in daylight hours. The site is likely to be fit with safety lighting in the event of an incident where lighting is needed, however it is considered that the location of any lighting and its impacts can be adequately controlled by condition.
45. **Construction Impacts** - impacts in this regard would be temporary for a period of 12-14 months. The CTMP, the updated version of which is submitted herein, sets out the control measures that would be utilised to limit adverse impacts during this period with regards to traffic movements. It is assumed that the LPA will attach conditions relating to working hours, dust suppression and other related matters to ensure local receptors are not adversely impacted during the construction period.
46. **Site suitability / alternative sites** - a detailed Alternative Site Assessment has been submitted to the LPA. This sets out the criteria for a BESS development and how the application site was chosen. It is concluded that the application site is suitable for this development and that there are no other sites available which are outside of the Green Belt designation.
47. **Cumulative impacts** - It is acknowledged that there are a number of other proposed and approved BESS developments in the vicinity of the Cellarhead grid supply point. This is commonplace where capacity exists on the grid, with some locations hosting clusters of development. This is necessary if the UK is going to meet its energy needs. The ES and the subsequent updated information on landscape and visual impacts and traffic and transport demonstrate that there are no significant cumulative environmental impacts associated with the proposed development.
48. **Local economy/businesses** - it is not considered there would be any negative impacts on local businesses or the local economy in general as a result of the proposed development. Business rates of a minimum of £250k per annum would be paid to the council. In addition, an investment in local electrical infrastructure of £400k; this is since the development would be remotely monitored and, when laying cable for the scheme, the applicant is obliged to ensure that the fibre network in the area is upgraded to a high specification. In a semi-rural area such as this, this means better connectivity and access to high speed fibre broadband networks for local residents.
49. **Lack of community engagement** - in this instance, the applicants chose not to undertake a formal public consultation exercise, which itself is voluntary. This is since it is considered that impacts on local residents is likely to be minimal as a result of the proposals. It should be noted



that Root Power are committed to providing public benefits in the areas they operate; the applicants collaborate with local farmers providing essential resources, tools and financial support to promote sustainable farming practices. These partnerships create a direct link between renewable energy projects and tangible improvement to local agriculture, helping rural communities to thrive.

50. In addition, Root Power are committed to giving back to communities and offer a community fund for all operational projects, awarded annually for the lifetime of the development (30 or 40 years). These funds aim to support local life through two dedicated pots; firstly through long-term partnerships offering sustained support for local charities, community clubs and grassroots incentives, and secondly by offering short-term boosts of quick on-off funding, like roof repairs or supporting local groups to plant wildflowers to increase local biodiversity and aid local pollinators.
51. It is noted that a small number of letters of support have been received with regards to the proposals which support the sustainability credentials of the proposed development in supporting renewable energy deployment and energy resilience, and the with regards to the benefits locally of investment in the area.
52. It is considered that the amendments and updated assessments submitted herein address the concerns of statutory consultees and the Council. We would welcome the opportunity to talk through the changes in more detail with officers in the near future as we progress towards determination of the application.
53. If there are any queries on the information submitted herein, please do not hesitate to contact me at your earlier convenience.

Yours sincerely

Louise Leyland MRTPI
Director
Energy Planning (part of the PWA Planning Group)