

Greenfields BESS – Planning Statement Addendum

This Planning Statement Addendum has been prepared by Enso Energy on behalf of the Applicant, Enso Green Holdings X Limited, for the proposed Greenfields Battery Energy Storage System ('BESS') on land at Greenfields Farm, Thorney Edge Road, Bagnall, Stoke-on-Trent.

This statement provides an appraisal of the proposed development in the context of the revised National Planning Policy Framework. The Greenfields BESS planning application was validated by Staffordshire Moorlands District Council on 1st October 2025. This was prior to the publication of the revised NPPF on 12th December 2024.

Reference is made to several appeal decisions for renewable and low-carbon energy projects that have been determined since the revised NPPF was published.

Revised National Planning Policy Framework (NPPF) – December 2024

The aims of the NPPF revisions are to encourage the use of appropriate land for housing, commercial projects and renewable / low carbon energy development, while also strengthening the Government's commitment to expanding renewable and low carbon infrastructure. The NPPF recognises the critical national priority of delivering large-scale battery storage to meet the UK's ambitious grid decarbonisation target on our way to delivering Net Zero.

The Applicant considers the revisions to the NPPF offer clear additional support for the proposed development. Specifically, the introduction of the 'Grey Belt' designation presents a strong further justification for granting planning permission.

Grey Belt

The definition of Grey Belt land is set out in Annex 2: Glossary of the NPPF 2024 and is defined as:

"...land in the GB comprising previously developed land (PDL) and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in

Framework paragraph 143. 'Grey Belt' excludes land where the application of the policies relating to the areas or assets in Footnote 7 (other than GB) would provide a strong reason for refusing or restricting development."

As to the first part of the definition, the Site is not considered to be Previously Developed Land. Regarding the second part, the site must pass the test of whether the land does not strongly contribute to Purpose a) – *to check the unrestricted sprawl of large built-up areas*; Purpose b) – *to prevent neighbouring towns merging into one another*; and Purpose d) – *to preserve the setting and special character of historic towns*. Accordingly:

- There is **no harm** to Purpose a) - The Site plays no clear role in checking the unrestricted sprawl of large built-up areas. It is remote from and not clearly associated with the nearest settlement. The Proposed Development is most closely associated with the existing Cellarhead Substation and it would not appear incongruous in this context.
- There is **no harm** to Purpose b) – The Site is remote from the nearest towns and is well separated from those parcels of land adjoining the nearby towns and large villages.
- There is **no harm** to Purpose d) – Not relevant in this case.

The Staffordshire Moorlands District Council Green Belt Assessment (2015) gives “**Limited Contribution**” weighting to purposes a), b) and d) – the “*strong contribution*” test set out within the NPPF is therefore not met when viewed against the Applicant’s assessment, and the Council’s own Green Belt Assessment.

The proposed development is a relatively small portion of a much larger parcel of land located to the northeast of Werrington. Consequently, the proposal would not significantly lead to the unrestricted sprawl of a large built-up area, nor would it significantly contribute to the merging of neighbouring towns, therefore not conflicting with purposes a) and b) on a localised scale.

While the Site area extends to approximately 9.74 ha in total, this is a very small proportion (approximately 0.02%) of the Stoke Green Belt which extends to some 44,438 hectares, and an even smaller proportion of all Green Belts in England (1.6 million hectares). Based on this conclusion, the site at a localised level does not strongly contribute to purposes a), b) and d) and the proposed development

would not fundamentally undermine the purposes of the remaining Green Belt. The site should be regarded as Grey Belt.

However, for the proposal to be considered as “not inappropriate” development, it must satisfy all the criterion, a to d, of NPPF paragraph 155. These are:

“155. The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

Criteria a) of Paragraph 155 is satisfied, by virtue of the above assessment.

Criteria b) of paragraph 155 is satisfied; there is a clear and demonstrable need for BESS which have a key role to play in achieving a Net Zero and providing flexibility. Storage is needed to reduce the costs of the electricity system and to increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. Storage can provide various benefits, locally and nationally, including maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the National Electricity Transmission System Operator (NESO) and Distribution Network Operators (DNO) to help operate the system, reduce constraints on the networks and help to defer or avoid the need for costly network upgrades as demand increases. One of the constraints to the early development of renewable and low carbon energy and associated infrastructure is the ability to access the local grid. In some places, notwithstanding the appetite to develop projects, grid connections are not available until the late 2030s. This project can make a material contribution to the clean power pathway required to

achieve net zero and significant weight should be attached to this aspect. The above context provides reason to show that the requirement paragraph 155 b) is met.

Criteria c) of Paragraph 155 is satisfied; the thrust of paragraph 110 of the NPPF relates to development that would generate activity and significant level of vehicle movements, particularly by car. With this development there would be two phases, the construction phase and the operational phase. The Highway Authority has no objection to the Proposed Development; traffic movements associated with the BESS would not be significant, nor would it have an unacceptable effect of highway capacity or safety. The requirement of paragraph 155 c) is met.

Criteria d), the “Golden Rules” are for housing developments and do not apply to this application.

The relevant criteria outlined in paragraph 155 of the NPPF are satisfied, and this development is considered **not inappropriate** in the Green Belt. Where a development is deemed not to be inappropriate, it should not be viewed as harmful to the openness of the Green Belt or to the purposes of including land within it.

In the eventuality that the decision maker does not consider the site to be ‘Grey Belt’, then the Applicant has demonstrated through the application that Very Special Circumstances exist in this instance which justify allowing this development in the Green Belt; the adverse impacts of granting permission in this particular instance do not significantly and demonstrably outweigh the benefits.

Recent Appeal Decisions

The below appeal decisions for renewable and low-carbon energy projects that have been determined since the revised NPPF was published. The Applicant accepts that every site should be assessed on its own merits, the overall message is clear that this type of development should be supported.

APP/B3438/W/24/3351328 – Land East of Bemersley Road, Ball Green, Staffordshire (Staffordshire Moorlands District Council)

The Appeal was allowed and planning permission granted for BESS at Land East of Bemersley Road, Ball Green, Staffordshire

The Inspector found that although the Green Belt review of the larger land parcel concluded the area was significant in checking eastward urban sprawl, the appeal site itself made only a minor contribution to the purposes of Green Belt designation.

The Inspector concluded the substantial national need for battery storage supporting renewable energy and grid flexibility provided strong material weight in favour of the development. Although there was a night-time noise impact that amounted to a limited infringement of residents' human rights, this was outweighed by the public interest in decarbonisation and energy resilience.

Consequently, the Inspector found that the harm to Green Belt openness and the human rights impact were less than the benefits of the proposal, and planning permission was granted.

APP/Q3115/W/24/3358132 – Land to the north of Culham Science Centre, Culham (South Oxfordshire District Council)

The Appeal was allowed and planning permission granted for a BESS at land north of Culham Science Centre.

The main parts of the site lie within the Green Belt; the northern portion lies within the Nuneham Courtenay Grade I Registered Park & Garden, with woodland within a Conservation Area beyond. The Inspector found that although the proposed development would cause “*less than substantial harm*” to the heritage landscape and would have a moderate adverse short-term landscape impact, this would reduce over time as screening matured. The Inspector also described the site as “grey belt” land, concluding it made a limited contribution to Green Belt purposes and thus was more suitable for development than “strong” Green Belt land.

Balancing harm and benefits, the Inspector accepted that there was an urgent national need for large-scale battery storage infrastructure to support renewable generation and grid stability, which outweighed the identified harms.

APP/N4720/w/24/3354875 – Land at Westfield Road, Carlton, Leeds

The Appeal was allowed and planning permission granted for a BESS development on land at Westfield Road, Carlton, Leeds.

The Inspector found the site to be “*Grey Belt*”; the Site did not strongly contribute to purposed a), b) or d) in NPPF paragraph 143 and therefore comprised *Grey Belt* and for the purposes of NPPF paragraph 155. Additionally, the Inspector concluded that the proposal would not comprise inappropriate development in the *Green Belt* and it was “*not necessary to assess the proposal’s impact on openness or determine whether other considerations amount to very special circumstances to justify development in the Green Belt*”.

The Inspector considers the role of Energy Storage; it is essential for reaching net-zero, improving energy system flexibility, and integrating low-carbon power. It reduces system costs and boosts reliability by storing surplus electricity for use during peak demand. Storage supports both local and national energy needs by maximizing output from renewables, reducing generation capacity needs, and helping manage the grid efficiently. The Inspector found the proposal supports the Government's clean energy goals, and this must be given significant weight in planning decisions, as required by the NPPF.

Conclusion

The revised NPPF strengthens the policy support found in previous versions. It states unequivocally at paragraph 161 that *“the planning system should support the transition to net zero by 2050... 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”*.

NPS EN-1 states at paragraph 3.3.25 that *“Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated”*.

The Greenfields BESS will support the UK’s legally binding transition to a Net Zero economy. The Proposed Development is clearly a form of sustainable development that will deliver benefits at a local and national scale. By enhancing renewable energy integration, reducing carbon emissions, and providing vital grid services, this project aligns with UK Government’s energy goals and contributes to a greener, more resilient energy system.

It is the Applicant’s position that:

1. The Site is classified as Grey Belt.
2. The Proposed Development is not inappropriate development in the Green Belt.
3. If the decision-maker does decide that the Proposed Development is inappropriate development, then Very Special Circumstances exist to justify the development.