

SMDC Planning Reference –	SMD/2024/0423		
Site Name –	Greenfields Farm Battery Storage Facility		
Summary of proposals -	320 No. battery storage units and 80 No. transformer units and associated ancillary facilities including landscape planting proposals and acoustic fencing.		
Consultation Note Subject –	Landscape and Visual Matters		
Planning Case Officer –	Richard Wilshaw		
Landscape Comments Prepared By –	Stuart Ryder of Ryder Landscape Consultants		
Date of site visit —	27/2/25	Date of response(s)	30/3/25 Rev A 7/4/25 Rev B – 5/10/25 Rev C – 23/10/25
Summary of anticipated landscape and visual effect	There will be a Major, Adverse landscape effect at the Site at Year 0 that will reduce to a Major/Moderate, Adverse landscape effect during the operational life of the facility. However there would be a Moderate, Beneficial wider landscape effect from the more extensive landscape planting across the broader farm holding. Visual effects are considered to be limited with FP Cheddleton 49 experiencing the most notable visual change but also from Cheddleton 58		
Results of request for further information Initial request in italics Subsequent response in standard	Further information is requested for: • <i>Details of any buildings on Site with confirmation of the dark rectangular boxes within the sub-station area with further architectural information</i> – Part response with indication that they will be made to look agricultural but not specific architectural elevations to allow their appearance to be judged. • <i>Levels / cut and fill on Site including indication of any retaining structures required to form flatter development compounds</i> – Earthworks drawing and cut and fill indication given but not the actual form of retention e.g. crib wall, sheet piles, gabions but positioning of bunds indicated; and • <i>Confirmation that the blue circles at the compound entrances are water tanks as detailed on CD-01-P10 and the function of the northern attenuation basin</i> – Confirmed as water tanks and northern depression is indicated as meadow area only and not part of any fire strategy. • <i>Acoustic Barriers discussion came forward from Rev B of the note</i> – It has been confirmed that the original barriers remain necessary and a discussion of these effects has been included at the end of Section 5 – Visual Effects – see pages 10 & 11.		

Dear Richard

**SMD/2024/0423 - GREENFIELDS FARM BESS PROPOSALS – LANDSCAPE AND VISUAL CONSULTATION
Rev B**

Thank you for appointing us to review the landscape and visual aspects of the submitted planning application and I pass a series of comments under the following headings;

1. List and implications of the proposed changes;
2. Site and surrounding's landscape character
3. Proposals for the site
4. Landscape effects
5. Visual effects from surrounding areas
6. Cumulative effects
7. Review of submitted LVIA
8. Potential design considerations
9. Suggested Planning Conditions

1. List and implications of the proposed changes

In comparing the Rev G version of the Detailed Soft Landscape Plan to the Rev E iteration the following principle changes are noted:

Removal of small battery yard in the north west field – this is welcomed as it allows retention of the existing field boundary and reduces the visual effects for receptors to the west of the Site.

Provision of a 1.5m high 1 in 3 bund in the north west field – also welcomed to assist with screening for receptors to the west.

Lowering the Gas Insulated Switchgear building by approximately 3 to 4.5m to set the building lower within the development. This is a positive move to reduce its visual effects and visible scale from nearby PROWs. However it will still be visible from the paths and more architectural information would assist to allow assessment of its end appearance.

Bunding to south side of the south west and eastern battery yards – this is welcomed in principle but its forms should not be a 1 in 3 – 1 in 3 trapezoidal embankment but should be viewed as more land form with sweeping ends to the bunds and variety to the 1 in 3 form – please see attached scan. A specific Planning Condition is included and the inclusion of LDA's Landscape Architects in the design of the bunds form is encouraged.

A second tree and hedge line is included closer to the eastern edge of the battery yards – again welcomed as a way of building up screening layers in the landscape.

The updated landscape chapters of the Environmental Statement explain that a different, smaller type of battery is being proposed and this has led to their change in orientation from north west to south east – this has limited effect from a landscape and visual point of view as they will still be a repeated, regular pattern of non-rural elements;

I also note from the updated landscape chapters of the Environmental Statement that a range of green shades are being proposed for the different equipment – again this is welcomed and Conditioned.

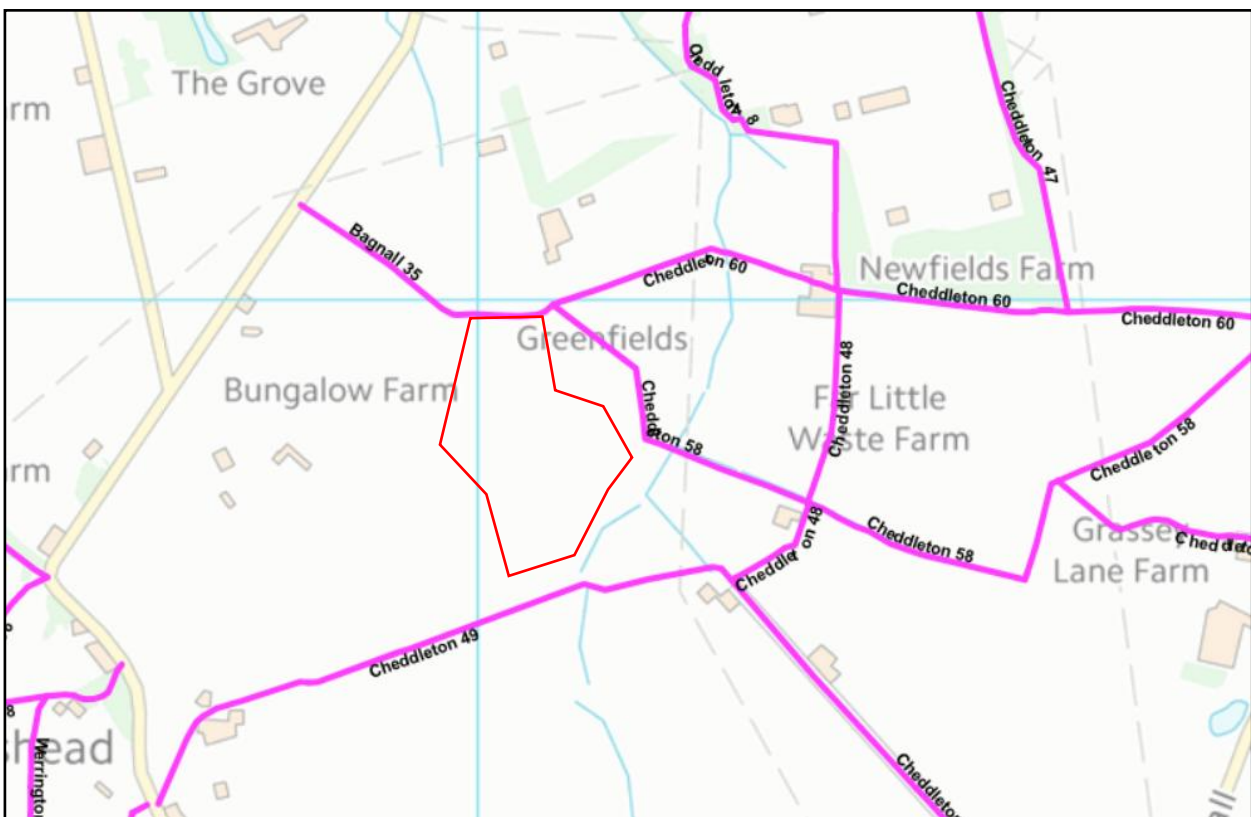
2. Site and surrounding's landscape character

The site is a series of four existing pasture fields set at an elevation of approximately 231m to 243m AOD. The ES at 3.2.5 states:

The total area contained within the red line planning application boundary (Figure 1-1) is 9.74 Ha (main BESS Site plus the cable corridor).

The fields are generally bounded by native hedgerows with some open, gappy hedge stretches reinforced with timber post and mesh fencing. The only field in use at the time of the site survey was the northern one near to the Greenfields farmhouse that held horses.

The Site and the surrounding similar medium sized pasture fields are not subject to any landscape designations or form the setting to any sensitive features such as Listed properties, or Scheduled Monuments. Pylons at Cellarhead sub-station can be seen on the skyline.



Extract from Staffordshire CC Online PRow Map with Site approximately positioned upon it

Footpath Cheddleton FP49 runs close to the south of the Site and Bagnell FP35 next to the northern boundary.

I would not class the Site or the surrounding area as a 'valued landscape' as per NPPF Para 187 a) but its hedgerow pattern is of value and its long-term preservation or ideally enhancement as hedgerow is important for sustaining landscape character in the area.

Looking to the contextual area around the Site and using the cardinal points to locate features the following are of interest;

North – Lies Greenfields Farm set approximately 55m to the north. The farm is promoted as an equestrian centre and architectural salvage business. One area of salvage storage lies to the north west at a distance of 200m from the Site adjacent to Thorney Edge Road.

East – Lies Newfield Farm (site of one refused and current re-submitted BESS application) at a distance of 225m from the east edge of the Site. Beyond Newfield Farm at a distance of approximately 365m is the Cellarhead Sub-station that is the supply point for the energy to be stored.

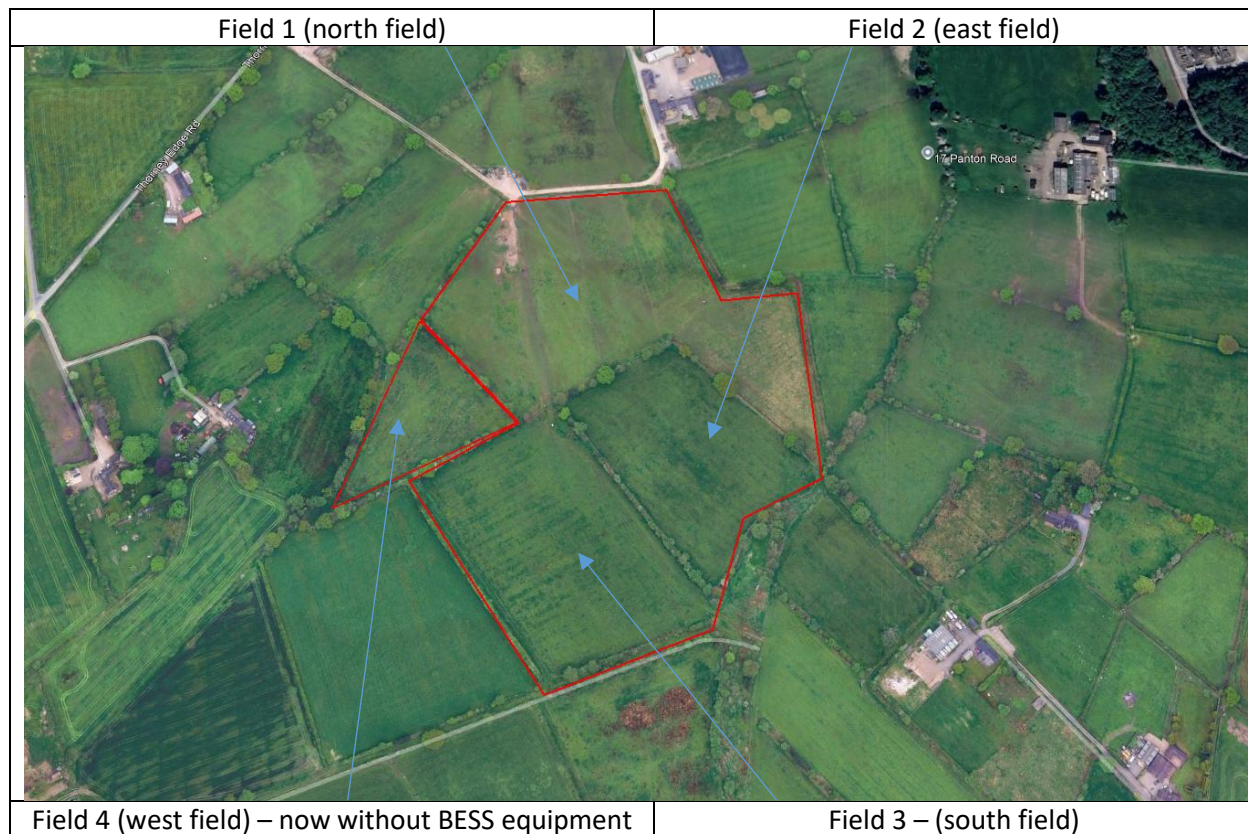
South – Lies Cheddleton FP49 and the consented BESS scheme at Armshead Farm. It is generally lower lying land to the south with the local stream running in this area and marshier, wetter pasture fields with sedge apparent.

West – Lie further sloping pasture fields running up to Bungalow Farm and Thorney Edge Road which in itself runs into Armshead Road. Bungalow Farm and its neighbour at Green Farm appears to possibly have been sub-divided into a number of residential properties.

3. Proposals for the Site

Construction access is proposed from Thorney Edge Road at the point of access to the current architectural salvage yard. The route appears to follow the existing track towards the three/four fields that contain the proposed BESS equipment.

The four fields have been numbered 1 to 4 in clockwise fashion for the purposes of this description:



Field 1 is the largest installation field is Field 1 with 128 No Storage units serviced by 32 No. transformer units. The layout is in three main rows with the axis of the units running with the field's contours and one line to the west side of the field running at 90° to the rest. The altered direction of units appears to have been provided to protect the existing field hedge. One of the proposed permanent tracks runs into

the north side of Field 1 off the existing track. Internal tracks between the rows allow for construction and maintenance crane access. To the east side of Field 1 is an indicated attenuation basin. Whether this is for surface water management, fire fighting or to act as a lined sump in case of water bourn fire water pollution run-off is not stated on the Illustrative Masterplan. It does not appear to be set at the lowest point of the Site which adds further question to its operation and function.

Field 4 is now put to meadow with trapezoidal bunding to the east side. There is space within this field to accommodate the additional width of bund to create a gentler, less alien 1 in 3 standard bund form.

Field 2 – is similar in scale to Field 1 with Storage units and transformer units. The units are arranged in three rows of 22 storage units with an asymmetrically positioned access road set to the southern end of the rows. This access road leads out of the Site to the north re-joining the main access track to provide a looped access onto and off the Site. Field 2 also has internal access routes to Field 1 and Field 3.

Field 3 – is the location of the DNO and Customers sub-stations and a number of battery units at 48 No supplied by 12 No transformer units. These sub-stations are accessed off Field 1 to the north whilst the 26 No storage units via Field 2 to the east. The sub-stations are indicated set within security fencing. Field 3 is also shown as host to two dark grey rectangles that are presumed to be buildings such as Gas Insulated Switchgear (GIS) structures. They are not labelled on the key to explain what they are or what finish they will present within the landscape. They are however illustrated on the visualisations (ES Fig 6.-7) and those for Viewpoint 3 at Years 1 and 15 show large, rectangular buildings presented with green cladding. The DAS does not seem to have specific information about these buildings e.g. height, materials, function, they appear to be the largest individual elements within the proposals.

Fig 3.6 indicates that the sub-station has one or two switchgear buildings set to 13.0m in height and 20m in length. There is no information as to the finishes of the building. They will appear industrial in scale given the height which is the equivalent of a 3 or 4 storey building. Agricultural buildings, even contemporary barns are lower in height than the proposed switch gear building. Also illustrated on the sub-station elevations is a firewall the material of which is not indicated but its proposed height of 10m is given. This would form an additional wall to the proposed acoustic barriers set along various of the Site's boundaries.

A series of generic features are common to all the areas. They include;

- Stoned access tracks;
- Boundary fencing which is presumed to include palisade fencing to the sub-stations' compound;
- Acoustic fencing which is not marked on the key to the Enso Energy drawing CD-01-P02 Rev 2 but is detailed further on the landscape drawing by LDA; and
- CCTV Cameras.

Likewise there are a series of blue circular symbols marked on the Site Plan and the landscape drawing that remain unmarked in either key. They are positioned in pairs or groups of four and are taken as water tanks positioned near to the site access points. Drawing CD-01-P10 shows water tanks approximately 3.45m in diameter and a similar 3.65m high.

Finally with regards to missing information there is no indication of how the proposed DNO sub-station is connected to Cellarhead Sub-station. The DAS explains that an underground connection will be provided but a defined route from the proposals to Cellarhead sub-station would be beneficial to establish. Such a route would require an ongoing wayleave and will restrict the type of planting that can be put in that wayleave. It will likely be explained that the route of the cabling is a matter for the DNO

supplier but it should ideally be considered in the ES or an indicative route mapped out to understand potential impacts to trees and hedges from it.

It is unclear whether acoustic fencing is still required around the battery yards, none is shown on the landscape drawings but previously the following barriers were indicated;

- 3.5m tall – Set to the east and west sides of Field 2 and the south side of Field 3.
- 4.5m tall – Set to the west side of Field 3 near the sub-stations around the east side of Field 1 nearest to Greenfields Farm.
- 5.5m tall – Set around the 10 No. units in Field 4.

Landscape planting proposals are shown ranging across the Site but not within the battery compound areas that are kept open for operational and safety reasons. The landscape mitigation strategy appears to building up 'layers' of vegetation in the landscape to provide screening in short and mid-distance views. This is done by;

- Native hedgerow planting – 2,073 Sq.m is indicated but new hedgerow is usually measured in linear metres but now also with a further new hedgerow to the east of the battery compounds;
- Hedgerow enhancement – 330 Sq.m is indicated;
- Native Scrub/Shrub and tree planting – 15,492 Sq.m or 1.5 Ha is indicated
- Proposed individual tree planting within existing field boundaries – 47 No. trees indicated.

There are a series of different meadow mixtures proposed for the remnant parts of the fields but these will not add any screening to the proposals and could look at odds compared with the wider grazed pastures. They will however if established and managed sensitively provide BNG benefits.

Breaking through existing field boundaries appears to be necessary to link the individual fields of the BESS albeit some of the internal tracks may link through existing breaks and access points in the internal hedges.

Colours and reflectivity of materials is not discussed in detail other than to say that the facilities can be painted in green to assist with their assimilation with the rural setting. If the features are painted a uniform green colour it may draw more attention to the fact that the facilities are all the same rather than have the variation of greens that occur within a rural area and which vary across the seasons.

4. Landscape effects

Taking the Site as a whole I consider it has **Medium** landscape sensitivity. This sensitivity judgement is derived from a Medium landscape value and Medium susceptibility to proposals of this sort.

The magnitude of landscape change across the Site is **Large** with two of the four fields (fields 2 & 3) totally filled with energy infrastructure, Field 1 is largely changed as well, whilst Field 4 is now not physically being developed it is immediately adjacent to the remainder of the development.

Combining a Medium landscape sensitivity with a Large magnitude of effect returns a **Major/Moderate, Adverse** landscape effect. This is the Year 0 effect when construction has stopped but the mitigation proposals have not yet started to take effect.

The proposals will effectively turn the three developed site fields into an area of electrical infrastructure. With the mitigation proposals established there will be a reduction in the scale of landscape effects and for the Site I would judge it to a **Moderate, Adverse and Long Term Temporary** landscape effect that is an inevitability of development.

It is classed as **Temporary** as it is assumed that the development will be granted under licence for a period of 40 years or similar. The Landscape section of the Environmental Statement refers to these effects as semi-permanent and at Section 6.9.31 defines this Semi-Permanent for the duration of 10 to 40 years. This temporal period will be perceived as **Permanent** by human receptors who pass by the Site but in landscape terms can be classed as **Temporary** particularly given the relative ease of reversibility with regards to the fixtures and fittings of the battery site.

The proposals are not considered in keeping with the wider pastoral landscape character of the Ancient Plateau Farmland but there is the existing power infrastructure at Cellarhead and four other consented battery facilities proposed near to it. However, this may lead to a sense of proliferation and an increased cumulative effect. The closest BESS development is to the south east on the other side of the Cheddleton FP49 PRoW and is referred to as the Armshead Farm BESS. This BESS is smaller than the proposed development at approximately a third of the size of the Greenfields Farm proposals that will appear larger in the landscape. Combined their presence will span both sides of FP49.

There are a number of built features within the BESS that will appear intrusive within this rural landscape, they include;

- The sub-station equipment albeit there is local precedent with Cellarhead sub-station and future sub-stations serving each of the recently consented BESS schemes;
- The presence of the two large block shaped buildings in Field 3 extending the sense of land use change from rural to industrial with their '*functional*' appearance – albeit the latest design iteration suggests that these could be styled as agricultural buildings and set at a lower level to reduce their visual intrusion;
- The individual transformers and associated battery storage containers laid out in a regular grid pattern across the fields where this quantity of structures and regularity of pattern is not commonplace;
- The noise attenuation acoustic fencing which is presumed to still be part of the application. These are solid barriers with a regular top line in a landscape where hedges and agricultural mesh fences up to a height of 1.5m are typical; and
- Peripheral features such as palisade security fencing, water tanks, kiosk buildings and the quantum of stoned access tracks where pasture fields are expected.

The ability to retain the existing hedgerow network to provide some internal planting buffers is acknowledged as is the fact the retained hedges will break up the BESS into three separate sections. The retention of hedgerows and trees on Site cannot be classed as a Biodiversity Net Gain (BNG) however new hedgerow and scrub planting can and this is proposed around the wider Site.

Bunding is now indicated on the LDA Landscape Plan as is cut and fill proposals from RPS. BESS schemes tend to require flat development platforms particularly for the sub-station compounds. The receiving landscape has undulations within the fields with a general topographical fall to the south. There is now some information as to changes of level with the RPS Plan DR-C-600-01 P03 – Proposed Levels Strategy being the most informative but still lacking information as to the final construction form the earthworks and geo-technical works would take. By retaining the hedges and trees around the three/four fields it means any earthworks will be required to be included within the fields and respect the root protection areas of the trees and hedges.

The bunds as presented are trapezoidal in form with 1 in 3 side gradients for simple stability and can appear artificial in their own right within the rural landscape. Asymmetrical sections and shallower side gradients help to assimilate the bunds within the landscape to the point where they are covered by tree

and scrub growth and their presence is lost. The uniformity of profile and route will likely take the eye to them and the development beyond rather than assist in forming an appropriate setting for the BESS. The scanned plan that is attached indicates where the ends of these bunds could be flared out and gradients slackened off to help improve their appearance.

It is a repeated fact that for BESS schemes the earthworks design and creating flat platforms for the sub-stations (at least) is often overlooked or not understood as the maximisation of battery unit numbers within field parcels is the primary design factor rather than thinking about the ground form as a 3-Dimensional entity. The design proposals are showing more of this information now but it is not yet at a detailed level where the earthworks and retention are fully illustrated and enforceable, at the very least an earthworks condition is required and you may wish to seek further information on the form of retention and restoration as both have the potential to have long-term adverse effects on the landscape as a result of this 'temporary' development and land use.

The landscape scrub planting is anticipated to start having a noticeable screening effect 10 years after planting and present an established scrub edge to the facility after 15 years. The wildflower meadow would be quicker to establish in 1 to 2 years but will require careful ongoing management to reach their intended end state of species rich sward. Their long term management should be controllable through Habitat Management and Maintenance Plans (HMMP) linked to BNG targets and inspection. Management through grazing should be avoided given the rest of the Greenfields Farm horse livery business and the tendency for horses to overgraze and poach the ground. If the scheme is consented then mowing and hay cropping is the preferred management regime.

On cessation of energy storage and the removal of equipment and tracks there would be a **Moderate/Minor, Beneficial and Permanent** landscape effect to the Site and associated contextual landscape should the established trees and scrub planting be retained. This also assumes that the centre of the fields where the proposed BESS equipment is located is reverted back to an agricultural use such as pasture fields and buildings and other built form is removed.

5. Visual effects from surrounding areas

There are a number of potential visual receptors that require consideration and potential screening to conserve their visual amenity and enjoyment of the area. My review of mapping and walking of the area suggest the visual effects on the following public and private receptors need to be taken into account;

Public viewpoints:

- Users of Footpath Cheddleton FP 49 – close range views from the south;
- Users of Footpaths Cheddleton FP 58 & FP 60 – close range views from the east;
- Users of Footpath Bagnall FP 35 – close range views from the north; and
- Users of Armshead Road and Thorney Edge Road – mid range views from the west.

With regards to private views from residential locations the following have been identified:

- Greenfields Farm to the north (land owner of Site but still a residential receptor);
- Farms to the east – Newfields Farm and Far Little Waste Farm; and
- Farms to the west – Armshead Farm, Bungalow Farm and Green Farm.

I was not party to agreeing views with LDA for the Application LVIA but the above are generally included in the Environmental Statement.

Users of the local footpath network will have the closest public vantage points of the installation fields with the block buildings and acoustic barriers (if they are still proposed) being clearly evident from the

paths. The mitigation design response to create screening around the various fields will likely work for looking at the containers in Fields 2 & 3 where there is a sufficient depth of planting proposed but not be effective in terms of screening containers in Field 1. The northern two fields have more focus placed on grass sward creation and hold the scheme's attenuation basin. In my previous note I suggested that a greater degree of screen planting is required to the Fields 1 & 4 to assist in the assimilation of the development and in particular the acoustic barriers within the landscape. There has now been more planting shown in Fields 1 & 4 that I think aids the level of layered screening.

However the proposed screen planting with its additional elements will not totally hide sight to the two large buildings in Field 3. The fact that they are clad in green makes little difference as its block form and solidity will be seen. The reduction in apparent height by setting the buildings to a lower ground level will reduce their apparent scale but they will still be clearly evident from Footpath Cheddleton 49 as will some of the external transformer equipment. I am uncertain from the information supplied whether they would still be viewed as reaching above the sky or tree line from this route. To the best of my knowledge this remains the only BESS scheme in the area that has large buildings, as well as external sub-station equipment. The buildings as presented will appear more as industrial units rather than agricultural buildings. The fact that there is no pitch to the roof or change in material e.g. Yorkshire board cladding adds to their uncharacteristic, architectural styling. Their block form and scale will likely remain as a marker in the landscape for those visual receptors further away from Site who will generally experience lesser change from the lower containers and sub-station equipment. The camouflaging of the buildings as agricultural premises would assist the acceptance of the buildings in these longer views. They as built elements appear large and reduce the sense of visual openness within the Green Belt.

Acoustic barriers do not appear on the updated Detailed Soft Landscape Plan, nor the available site sections or the Site Layout Plan. Clarification as to their ongoing provision is suggested as I suspect they are still required in one form or another.

Acoustic barriers are large, regular walls with a repeated pattern of vertical I-beams which remove openness within the rural landscape but would be necessary to mitigate aural impacts. Visually solid they prevent views across the adjacent fields as well as introduce regularity and flat top lines within an agricultural landscape where the variety and randomness of hedges are an underlying characteristics. Anything above 1.8m appears tall in human scale terms so all three heights of barriers – 3.5m, 4.5m & 5.5m will be noticeable for their scale. Likewise a fire wall in the sub-station area at 10m in height would be readily notable.

A 5.5m height acoustic barrier as previously proposed is particularly high and I have not experienced a BESS scheme requiring such a height of barrier. The 5.5m section was shown on the previous iteration of the scheme set around the open side of the installation in Field 4. This may no longer need to be the case given the removal of the battery and transformer units from Field 4, or it may still be needed but at a reduced height to mitigate the noise from the remainder of the proposed equipment.

Other BESS schemes in the area have reduced the height of the ground to reduce the apparent height of their associated acoustic fencing. Acoustic barriers will cast a heavy shade onto planting, particularly when set to the south of new planting areas which in turn affects the establishment of the new stock. Another factor to consider, even in a rural setting such as this, is the 'blank canvas' appeal to spray paint artists who can readily tag such walls, or with greater effort produce more intricate graffiti. It is recognised that the boundaries are protected by CCTV and motion sensor equipment but many such acoustic barriers are targeted in other monitored locations such as motorway corridors.

The only thing of a similar height and form to acoustic barriers in an agricultural landscapes are silage clamps but these tend to be smaller in scale and typically associated with other farm structures such as barns and stores rather than edging whole fields.

There appears to be no use of green living walls as acoustic barriers which are easier to blend into the landscape with other planting schemes. With these updated proposals there now is the use of bunds to the south of fields 2 and 3 and these will aid screening of the lower parts and front rows of battery units but not the impression of rows until screen planting has established. There appears to be adequate space to provide more screen planting at Fields 1 & 4 which have now been augmented with additional planting and an acceptance of a reduction in BNG grassland credits.

As already commented upon above the bunding in its current form looks too regular and artificial in form, it is better considered as land form to marry in with available space. A second point to make is that plant establishment can at times be difficult given the perched nature of bunds above surrounding water tables and increased rainfall run-off from them. Neither of these issues are insurmountable but require increased maintenance activities or irrigation infrastructure which should be recognised in Landscape Maintenance and Management Plan.

The acoustic barriers will screen sight to some of the battery and transformer units that typically stand at 2.6m but some views are still anticipated from the south to the equipment in Fields 2 & 3 as the land rises up to the north and the containers will be visible above the acoustic barriers until the screen planting establishes.

The residential receptors are unlikely to have views from their principal, ground floor rooms but may have from their first floor rooms. I have not taken access to any of the residential locations to conduct a visual assessment however note that as most, if not all of the properties are farms the residents are likely to use the land around their properties for work and recreation. The block buildings in Field 3 are likely to be markers in the landscape positioning the proposals for these residential and working receptors. It should be noted that the removal of units from Field 4 is of benefit to residents of Green Farm and others to the west of the proposals through the reduction of the amount and proximity of BESS equipment from their properties.

The ES at 6.8.55 states that, '*Residential Visual Amenity Threshold referred to in LI TGN 02/2019, [not breached] which is not the case in respect of this development.*' I broadly agree with this conclusion with the one possible exception being Greenfields Farm itself who's residents have the closest living relationship with the proposals and who will presumably still experience 4.5m high acoustic barriers with limited screen planting.

Acoustic barriers

This section considers the likely effects of the noise attenuation barriers. It is presumed that the original noise barriers are retained at the same height and position with the exception of the 5.5m high barrier pulled back out of Field 4 to the western edge of Field 1.

Two ground form matters will however affect the perception of the noise barriers. They are sinking the ground level platform for the DNO and GIS and the inclusion of the proposed bunding to the south.

The 5.5m barrier to the west will visually be less prominent set to the east side of the existing partial tree line. The barrier would be more visible in winter and spring after leaf fall. There are no public visual receptors but two farm receptors are set to the west.

The 3.5m barrier to the south would still be visible above the 1.5m bund but would be screened quicker by the elevated planting on the bund. A 3.5m solid barrier would take approximately 10 to 12 years

without the bund and this time could be reduced to 6 to 8 years to screen the remaining 2.0m of visible acoustic barrier.

The 4.5m barrier to the east does not benefit from any proposed bunding or ground lowering. The southern portion of the barrier would benefit from intervening vegetation that would screen the barrier in an anticipated 12 to 15 years. However the northern end nearer to Green Field Farm itself is set near to the proposed SuDS basin and no significant screen planting is indicated. It is this north east section of 4.5m acoustic barrier that will be the most obvious to Footpath users to the east and north. Treating the north end of the barrier with additional planting to match the southern end would be preferred and the reduction of the basin's western edge. There may be a need to recalculate BNG figures if the basin's habitat is included in those calculations.

6 Cumulative effects

There will be cumulative landscape and visual effects with other BESS schemes in the area, primarily the Armshead Farm scheme and possibly the Newfields Farm BESS that is also currently seeking Planning Consent. The Armshead Farm scheme and this application Site will be jointly evident from Cheddleton FP 49. There is also a current planning application for New House Farm off Luzlow Lane with this application scheme and the New House Farm proposals both being evident of Luzlow Lane.

There will also be sequential cumulative effect for path users in the wider area that walk the routes past the three BESS schemes to the east and south of the Cellarhead sub-station.

The Landscape section of the updated ES considers cumulative effects at 6.10 which now includes other known schemes and makes it a more useful record of assessment. I have some comments to raise that I list out with reference to specific paragraphs of the updated ES document:

6.10.14 – ES defines the LCT Ancient Plateau Farmlands as of Community Value with Low susceptibility and therefore Low sensitivity to similar energy infrastructure schemes. With reference to the look-up Table at 6.3 this is the recommended sensitivity outcome. Why having a Low sensitivity outcome is critical in the assessment process is that it will only ever likely return a Moderate level of effect whatever the magnitude rating to be. SMDC do not use local level landscape character designations so it is difficult to class an undesignated landscape as anything other than having Community Value by this scale.

6.10.18 - This is the case with the magnitude of the operational landscape effects of the cumulative proposals with a Medium to High magnitude identified. Arguably the magnitude of effect is extensive and with a semi-permanent duration of 40 years the magnitude rating could be High. There is also reference in the definition of the extent at Table 6-6 of effects that cover more than half an extent should be defined as having a wide extent.

There is a difficulty or tension in applying measures of land area to the LCT as the LCT stands for Landscape Character **Type** and is not a prescribed geographic Landscape Character **Area**.

6.10.19 - The ES concludes that with regards to landscape change there would be a Medium to High Magnitude, which leads to a Moderate, Adverse effect. I have concerns that the extensive nature of all the energy schemes when combined has not been fully recognised in this cumulative assessment. Suffice it to say there is at least a Moderate, Adverse effect recognised and should be placed in the negative side of your planning balance.

6.10.19 – Also rightfully acknowledges that each of the energy schemes have come forward with their own sets of mitigation proposals. When established the landscape mitigation measures will set the various developments in new scrubby settings that will continue to mature over the lifetime of the

developments into a new more wooded landscape rather than the semi-upland, pasture landscape that is seen today.

My conclusion is that in terms of cumulative landscape effects that there will be a Moderate, Adverse cumulative landscape effect across the wider study area and this part of the Ancient Plateau Farmlands from the extensive nature of change that is fundamentally different to the receiving agrarian landscape. This sense of change would be evident for a period of 8 to 10 years until the mitigation establishes across the wider area. The sense of change would then be driven by the presence of developing, new woodland with the BESS and Solar sites increasingly being screened from being the dominant feature of this area of landscape. The energy infrastructure will still be there and part of the landscape character but one that is balanced by the new wooded character of the area. This reliance on wider woodland creation makes the importance of woodland establishment at the individual locations critical.

The best analogy I can think of relates to the reclamation of former mining areas or extensive landfill areas. After reclamation there is a decreasing sense of the extractive or waste management activities and an increased sense of new woodland cover that is generally very similar aged and of similar planting make-up. Strategically it may be better to seek different types of woodland at the various BESS locations to introduce visual variation and bio-hazard robustness.

With regards to cumulative visual effects the updated landscape section of the ES considers effects from representative viewpoints and four visual receptor groups (VRG). The VRG material includes consideration of sequential views which is how the majority of people will experience the energy schemes in the area.

The conclusions presented in Section 6.11.13 indicate that there would be significant cumulative visual effects for Visual Receptor Group 1: Public Rights of Way adjacent to Site (0-70m, North, East, South) and Visual Receptor Group 2: Surrounding farmsteads and local roads (up to 300m, West, East, South). during the construction period given their proximity to the considered schemes. I agree with this construction stage effect. However I would extend the duration of these cumulative effects out into the operational phase of the developments for a period of 8 to 10 years until the mitigation planting has established.

Likewise at Section 6.11.14 the conclusion of a lesser nonsignificant cumulative visual harm at a Moderate, Adverse level for Visual Receptor Group 4 - Public Rights of Way off Rownall Road (550m, East) appears reasonable. Again I consider this cumulative visual effect would be experienced until the mitigation planting establishes.

The section summary also concludes that Visual Receptor Group 3 – which includes residents and road users at the settlement edge of Werrington and along short sections of Armshead Road will not receive any cumulative effects. This on the whole appears to be a fair statement with limited opportunities for sequential views but there may be public locations on Wetley Rocks Common and Armshead Road where the Armshead Farm BESS and this application development are evident in the same view.

My conclusions are that the local footpath users in VRG1 & VRG2 will experience significant, adverse cumulative visual effects that will compound the scale of apparent visual change and this will extend in duration terms until the landscape mitigation planting for this and nearby schemes has successfully established and started to screen the proposals. This like the perception of landscape change is anticipated to be a period of 8 to 10 years. The combined changes in view for VRG3 & 4 is not as dramatic or notable and will similarly dissipate on establishment and early screening from the mitigation woodland.

The key to best managing the long term visual change and achieving a similar, or better level of scenic value within the wider area is to maintain active farming and open ground so visually and experientially the area still appears as agrarian in land use terms. Likewise limiting the ability to see intrusive, non-rural features such as acoustic barriers and DNO sub-stations is key to retaining the perceived sense of a rural landscape. Where features cannot be positioned to avoid visual change they should be disguised and designed to best fit the local rural character. For this scheme this means the GIS buildings, external transformers and boundary bunding.

7. Review of submitted LVIA information

The updated LVIA undertaken on behalf of the Applicant by LDA Landscape Architects forms Section 6 of the ES.

In broad terms it complies with GLVIA3 which is the guidance issued by the Landscape Institute and Institute of Environmental Management and Assessment (IEMA now named ISEP - The Institute of Sustainability and Environmental Professionals) for the production of LVIA work. It is informed by ZTV and ground-truthing works and includes an appropriate level of representative viewpoints. The Applicant sought to have these viewpoints confirmed prior to the LVIA production as recommended by the LVIA. SMDC did not respond to this request for comment.

The LVIA now looks at the effects on the Site itself, contextual area as well as the wider Landscape Character Type of the Ancient Plateau Farmlands. This is more helpful to understand the foreseeable effects on the landscape as a resource in its own right.

Likewise with regards to the landscape effects on the contextual area Para 6.9.37 repeats that landscape character change would be limited to a 300m distance from the Site. This I agree is a reasonable measure of influence but it should also be remembered that the development contributes to cumulative landscape and visual effects that extend in a sequential effect beyond the 300m.

Looking at the reporting of the visual effects I consider these to be generally fair and reasonable. There is a phrase in the red font of new description at 6.9.32 that states that taller planting will visually enclose the development. This should not be confused with visually screening the development which the proposals are unlikely to do until towards the end of their operational life – 40 years after planting.

My assessments may vary slightly but I agree that the only receptor group that is likely to experience a significant adverse visual effect are the users of local footpaths close to the Site. There however remains limited discussion of the visual effect of the acoustic fencing elements of the proposals.

The substation block buildings in Field 3 are discussed more in this updated LVIA with regards to the mitigation measures proposed to make them more acceptable within the landscape – see Section 6.6 Embedded Design Mitigation. There is now more specific reference to the sub-station building with Section 6.7.6 referring to it as larger scale infrastructure and discussing the potential for agricultural architectural appearance. Likewise similar commentary is provided at 6.9.58. It is clear that an intended agricultural treatment has been taken into account as the visual and landscape effects of the scheme have been assessed and should be delivered by any detailed design proposals so the built scheme does not appear more intrusive than the ES work assesses.

It remains interesting to note some of the descriptive language used for the duration of effects with the proposals now described as semi-permanent and Table 6-5 continuing to set any duration of effect above 25 years as permanent. Decisions on grounds of permanency and human perception from other BESS schemes sometimes refer to the length of installation as Long-Term Temporary. This is not applicable to the LDA Methodology as Long-term is defined as 10-25years. The use of semi-permanent

which initially appears as contradictory – how can a permanent feature only be semi-permanent? is acceptable in terminology and is explained at 6.3.19. It may be more useful as you determine this revised application that 40 years in human perception terms is effectively two generations or half an average human life span and will likely be perceived as a permanent feature.

Table 6-5: Duration

Permanent	The change is expected to be permanent and there is no intention for it to be reversed.
Long-term	The change is expected to be in place for 10-25 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.
Medium-term	The change is expected to be in place for 2-10 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.
Short-term	The change is expected to be in place for 0-2 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.

Growth rate for planting is given at 400mm per year within the ES (Para 6.3.35) citing Forestry Commission as a source but acknowledges this is also dependent on a series of factors. It also explains that it is this rate that has been used within the photo visualisation presented within the ES that have not been updated to reflect the additional planting, lowering of the block buildings or agricultural architecture. I still consider that a 400mm growth rate is ambitious for this semi-upland location but found the visualisations useful to illustrate the presence of the acoustic barriers within the viewpoints. I would also urge caution about thinking a tree or hedge of a certain height will screen a solid object set behind it. Firstly native tree and hedge canopies are rarely total and younger stock has not developed the thickness of canopy that creates the screening.

On removal of equipment in 40 years' time and presuming that all the landscape mitigation planting has established, it is still thriving and that it is left in situ then there would be a visual improvement to the rural appearance with more tree belts and variety of land cover in the area.

8. Potential design amendments

A series of design amendments were discussed in the last note and a marked copy of LDA Design Dwg No. 9258_101E returned with that note.

1. More screening to the north of the Site to improve the depth of screening at Footpath Bagnall 35 even if this means moving the attenuation basin to the south to accommodate a wider planting screen – Not addressed.
2. As per Point 1 – greater depth of screen planting is recommended to limit the visual effects from Footpath Cheddleton 58 – additional line of hedge and tree standards to the east of Fields 1 & 2;
3. Marking the existing Footpaths on the Detailed Soft Landscape Plan would assist the viewer in understanding the proximity of the route to the various elements of the proposed BESS – these have been added and are helpful;
4. Marking the proposed development of the Armshead Farm BESS would assist in understanding of potential cumulative effects – not added on the Detailed Soft Landscape Plan or Site layout but now added on the cumulative landscape assessment location plan – Savills drawing A-CSM-GFBESS-REV0;
5. Like Point 3 the marking of existing PRoW in this case Footpath Cheddleton FP49 would be helpful – now included;
6. A broadside of built form, to an unknown ridge height would be set facing the landscape and PRoW to the south, architectural detailing is recommended so that it appears as an agricultural

building in form and cladding, The ability to reduce the apparent height of 13m is encouraged with consideration of lowering floor levels – the buildings have now been lowered by between 3.5m to 4.5m and will likely appear as two storeys high above adjacent ground level, the agricultural detailing is not yet defined nor is any ridge height or apex form confirmed – a broadside is still presented to the closest visual receptor group to the south;

7. Similar to Point 6 presenting this building with similar agricultural styling would assist in reducing their intrusive nature within the rural landscape – same comments as Point 6;
8. Is some form of retention required to the north side of Field 3 to allow the creation of a flat platform for the sub-station equipment in this sloping field? – This has been confirmed as needed see Earthworks drawing but still needs to be defined in terms of form.
9. This adjunct of 20No. battery containers requires the highest acoustic barrier on Site at 5.5m tall given their proximity to residential receptors to the west, are they strictly necessary as the scheme could be contained within three fields without them and the height of the acoustic barriers may be reduced – this has now been removed from the proposals which I consider a betterment by reducing adverse visual and landscape effects to the west; and
10. The width of screen planting along the north west facing side of Field 1 appears limited given it is the forward view of path users on Footpath Bagnall 35 for approximately 100m and possibly longer. Having living green acoustic barriers been considered as alternatives or supplementary to the current acoustic barrier scheme – no apparent change to the proposals in this area between iterations.

In addition to the numbered points the following matters are raised as points of design clarification;

- Confirmation of drainage treatment on Site e.g. SuDS balancing pond, presumably the grey shaded surfacing is unbound stone that should be built off a geo-textile to assist with its removal in the future and how this links to the attenuation pond in Field 1 or nearby water courses – I still have uncertainty about these points but they may be answered in other documents;
- Confirmation that the effects of the underground cable connection to Cellarhead Sub-station have been taken into account within the Environmental Statement as associated works to the principal project – again uncertainty with regard to this element of the proposed works;
- Confirmation of land restoration processes on cessation of the battery storage park use, who will have legal responsibility for it and the time frame for its completion - again uncertainty with regard to this element of the proposed works but reference to de-commissioning of the proposals as a construction activity was noted within the LVIA;
- Acceptance that the facility on cessation of use is not classed as brownfield site or grey belt for the purpose of other development and reverts to a rural field.

Two further design clarification points are added here in response to the additional design proposals and assessment information:

That the intended architectural treatment for the two block buildings is to be agricultural in styling and this needs to be controllable through conditions should you be minded to grant consent; and

That the RPS Earthworks Plan – DR-C-600-01 status is only marked as Preliminary and it does not appear to include a bund to the southern side of Field 2 whereas it is shown on landscape drawings. This is presumably an oversight of an early draught of the earthworks plan and should be updated to reflect the landscape plan.

In addition, the submission of a long-term Landscape Maintenance and Management Plan (LMMP) for the duration of the development's operation will be required so the initial establishment and ongoing upkeep of the various landscape features, earthworks and ecological habitats can be confirmed and suitably Conditioned. Whether a separate document or part of the LMMP the processes required for the restoration of the proposed Site including the removal of tracks and hard standings on cessation of use as a battery park needs to be provided. The LMMP could be linked to the Habitat Management and Monitoring Plan (HMMP) that I suspect you will be seeking to understand and guarantee the BNG proposals fully.

8. Suggested planning conditions

There is clear landscape and visual harm to be put in the planning balance at the Site and in the contextual area but this is offset to some extent by the long term landscape enhancement the wider planting proposals would have. Should you be minded to grant planning consent and notwithstanding the already submitted landscape proposals the following Planning Conditions are suggested;

- A. That a detailed hard and soft landscape mitigation scheme, including plant and material schedules are submitted for consideration. This is to include building and equipment colour and finishes schedule for fencing and built form on the Site to deliver a mix of recessive colours within this intrinsically rural area. *Reason – to ensure that the proposals maintain the boundary character and respect the neighbouring landscape.*
- B. The soft landscape proposals should be implemented in the first growing season after construction has commenced and replacement of dead, diseased or dying stock should be undertaken in accordance with a Landscape Maintenance and Management Plan for a minimum period of 10 years. *Reason – to ensure the quality of the landscape mitigation measures and appropriate maintenance until they become effective.*
- C. That no tree felling or hedgerow removal is undertaken, or excavation within their root protection areas, without the express written agreement of SMDC's Arboricultural Officer and after consideration of tree sensitive construction processes – *Reason to protect the mature tree and hedge stock that contributes to the local landscape.*
- D. That a Landscape Maintenance and Management Plan (LMMP) is prepared for implementation by the site owners / tenants for the full operational life of the facility and that a legal arrangement for continuation of the LMMP by future owners is entered into – *Reason – to reflect the importance of the soft landscape mitigation proposals for the local landscape character.*
- E. Low light level scheme with no permanent lighting and emergency lighting building rather than mast mounted – *Reason – to reduce the intrusive nature of lighting in the rural landscape in the hours of darkness.*
- F. That architectural elevations for all buildings including those associated with the sub-station are submitted for and agreed by SMDC prior to any commencement on Site. The design intent and ongoing management of the buildings should be appropriate to their rural setting – *Reason – To protect the character and appearance of the rural area.*
- G. SuDS detail design with explanation of the drainage proposals, their ongoing maintenance to ensure effectiveness taking into account climate change projections and potential use during any fire incidents – *Reason – to ensure the effectiveness of the surface water management risk during precipitation and fire events.*
- H. That a schedule of works activities in the form of a site restoration plan is produced to explain the removal of the battery storage facilities, sub-station, buildings, acoustic barriers, fencing, ancillary equipment and tracks as part of full restoration of the Site back to pasture fields is

submitted for agreement with SMDC prior to the Site becoming operational – *Reason to protect local landscape character and rural amenity on the cessation of use as a power storage park.*

I recognise that the suggested conditions could possibly be combined with others that you may be considering and will require careful wording to be enforceable but wished to explain the reasoning behind them. I trust you find these updated comments useful as you consider the determination of this application.

Should you have any queries please do not hesitate to contact me.

Stuart Ryder

Ryder Landscape Consultants Ltd on behalf of

Staffordshire Moorlands District Council

23/10/25

C	Additional section of section on Acoustic Barriers	SR	HC	23/10/25
B	Response to updated soft landscape proposals, ES update and lowering of buildings. Updates in red font on the Rev B Note.	SR	HC	6/10/25
A	Site visit date corrected, overall numbers of indicated containers added and reference to sub-station building height confirmed.	SR	SLR	7/4/25
Rev	Nature of change	Prepared by	Checked by	Issue Date