

Consultation Response Form

Consultation from: Staffordshire Moorlands District Council	Contact: Declan Cleary
Your reference: SMD/2024/0568	Our reference: SCC/25/0115/CON
Received date: 02/09/2025	Response date: 03/11/2025
Application Type: Mineral Safeguarding Area	Case Officer: Isabelle Spencer
Description of Proposed Development: Battery Energy Storage System (BESS) and associated infrastructure (EIA development) (amended information).	
Location of Development: New House Farm, Luzlow Lane, Bagnall.	
Reasons for Exemption from Safeguarding Policies: [See Table 7 of Appendix 6 to the Minerals Local Plan for details] None	
Mineral Safeguarding Areas (MSA):	Silica Sand
Mineral Infrastructure Site nearby: N/A	
Waste Safeguarding considerations: N/A	
Waste Management Facilities nearby: N/A	
Relevant extract from our Standing Advice: Development that is temporary or easily removed, and involves minimal disturbance of the ground, such as poly tunnels, caravan parks, solar panels, or battery storage facilities, is unlikely to create a significant safeguarding issue.	
Recommendation Summary: Holding Objection	
Details and Reasoning: Having reviewed the revised documents, more information is required regarding the extent of proposed excavations. The application site is in a Mineral Safeguarding Area (MSA) for silica sand and although assurances have been provided regarding the safeguarding of underlying mineral, clarification is sought on the proposed earthworks and the effect on mineral resources. Furthermore, there is an increased requirement for off-site disposal of excavated materials. It is recommended that prior to determination of the application that clarification is provided regarding proposals for off-site disposal; and the reinstatement of the application site following the proposed decommissioning of the facility. The proposed restoration landform concept should be confirmed as well as whether there is a requirement to import materials to achieve an acceptable landform that can support a sustainable after use of the site.	

An outline materials management plan should be submitted to address the above concerns.

NOTE TO PLANNING OFFICER

Finally, I wish to take this opportunity to remind you of the policy requirement (as detailed in Policy 1.2 of the [Staffordshire and Stoke-on-Trent Joint Waste Local Plan](#), and as supported by paragraph 8 of the [National Planning Policy for Waste](#)) to make better use of waste associated with non-waste related development. In accordance with Policy 1.2, all 'major development' proposals (as defined in the [Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), or any subsequent changes/revisions) should:

- i. Use / Address waste as a resource;
- ii. Minimise waste as far as possible;
- iii. Demonstrate the use of sustainable design and construction techniques, i.e.: resource-efficiency in terms of sourcing of materials, construction methods, and demolition;
- iv. Enable the building to be easily decommissioned or reused for a new purpose; and enable the future recycling of the building fabric to be used for its constituent material;
- v. Maximise on-site management of construction, demolition and excavation waste arising during construction;
- vi. Make provision for waste collection to facilitate, where practicable, separated waste collection systems; and,
- vii. Be supported by a site waste management plan / waste audit if the development is likely to generate significant volumes of waste *

* updated to take account of Planning Practice Guidance – [Waste – Determining planning applications](#) - paragraph 049 - Should significant developments include a waste audit?