

SMDC Planning Reference –	SMD/2025/0354		
Site Name –	Leek Road, Cellarhead BESS Facility		
Summary of proposals -	Erection of a 300 MW Battery Energy Storage System (BESS) on a Site 7.98 Ha in size		
Consultation Note Subject –	Landscape and Visual Matters		
Planning Case Officer –	Chris Johnston		
Landscape Comments Prepared By –	Stuart Ryder of Ryder Landscape Consultants		
Date of site visit —	18/11/25	Date of response	19/11/25
Summary of anticipated landscape and visual effect	There will be Major/Moderate, Adverse landscape effect at the Site at Year 1 that will reduce to Moderate, Adverse, Long term Temporary by Year15. As well as the insertion of the DNO substation and the BESS containers there will be a notable change to landform to the eastern, currently sloping field. Visual effects are considered to be reasonably limited with views from Footpaths Caverswall 15 & 28. There will be no obvious visual or landscape links to the other BESS schemes set closer to Cellarhead substation itself. There will be a number of residential properties likely to experience adverse visual effects from first floor rear windows.		
Potential Information to Request	Details of any acoustic fencing, bunding or barriers that might be required at the Site in terms of location, height and finishes of the mitigating features. Confirmation that 300 MW storage in electrical capacity terms can be located within the battery compounds without further expansion or ‘double-stacking’ of containers. Means of electrical connection to the DNO substation confirming if it is above or below ground.		

Dear Chris

SMD/2025/0354 – LEEK ROAD, CELLARHEAD BESS PROPOSALS – LANDSCAPE AND VISUAL CONSULTATION

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. Methodology
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. Review of submitted landscape works
9. Suggested Planning Conditions

1. Methodology

Staffordshire Moorlands District Council (SMDC) appointed Ryder Landscape Consultants to consider the submitted scheme and supporting documents in October 2025. Stuart Ryder an experienced Chartered Landscape Architect has reviewed the Landscape material including the Rapport LVIA, aerial

photography and Staffordshire CC's Online PROW Map information. He attended Site on the 18th November, 2025 where he walked the footpaths in the vicinity of the proposed Site and drove local roads. Based on this desk-based and site survey work the following landscape and visual consultation response has been prepared.

2. Site and surrounding's landscape character

The site is largely formed from a pair of improved pasture field set at an elevation of approximately 261m to 248m AOD. There is associated land required for access routes and siting of the DNO substation. The higher side is its northern flank running down with the surrounding undulating landform to the lower point in the south. The eastern field has a notable slope that contributes to the wider sense of an undulating landscape. The southern or lower field is set towards the bottom of the local slope and is flatter in nature. The broader landform is undulating like the remainder of the area around Cellarhead with a local ridge that the A520 Leek Road runs upon approximately 275m to the west of the proposed southern battery yard.

Field boundaries comprise of native hedgerows in varying states of management with some being allowed to grow out. The very eastern side of the sloping field has a series of regular spaced hedgerow trees that form a notable line. I have not been able to open the Arboricultural Impact Assessment (AIA) on the SMDC Planning Portal to confirm their species type. There are no ridge and furrow field patterning evident on Site or in the context to it.

The Site and the surrounding similar medium sized pasture fields are not subject to any landscape designations nor form the setting to any sensitive features such as Listed properties, or Scheduled Monuments. The local ridge that the A520 follows to the west acts as a viewshed with the Site effectively separated from the landscape leading into Stoke-on-Trent further to the west. The A52 which runs to the north and then out to the east of the Site also runs along a ridge and then directly over the undulations. These two sections of higher ground have been utilised by the historic transport routes give the impression of a 'hollow' for the Site with it forming the south facing side of a small local valley.

The closest residential property is set to the north and appears associated with the Shirley Transport Yard. There are others set more as dispersed larger dwellings along the A520 Leek Road approximately 175 to 490m to the west of the red line boundary. Along the A52 Kinsley Road to the north of the Site there is a greater degree of more nucleated development with Cherry Gardens and Grove Court being built to the south of that road and extending towards the Site.

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

North – Shirley Transport Yard is set to the north and is a large yard that has taken a number of the sloping fields and is just as an HGV parking area with a combination of cabs and trailers evident. The A52 forms the edge of the landscape context to the Site.

East – Further pasture fields running up across the sloping ground of the undulating land form leading up to March Lane that is initially followed by Footpath Caverswall 28

South – Lies a narrow brook that drains this small valley before returning to sloping ground that rises to the south and is put to further improved pasture. There is a earth dumping ground to the south of Site.

West – Lie further medium scale pasture fields running up to the A520 and the houses that are set along it in a dispersed fashion. The fields behind the houses appear to be smaller than the Site fields and do not appear to have undergone any amalgamation.

I would not class the Site or the immediate surrounding area as a 'valued landscape' as per NPPF Para 187 a) but its field pattern contributes to the broader landscape character. Also worthy as a landscape asset are the hedgerow trees to the east of the sloping fields and undulating land form.

3. Proposals for the Site

Construction access is shown running to the east side of the existing Rix garage and Shirleys Transport Yard. It swan necks down to enter the eastern sloping field. This field will be subject to major earth re-modelling works to create a flatter 1 in 30 platform for the setting of BESS containers.

The second of the two separate container yards is set within the lower southern field. The DNO substation that services the BESS containers and protects the National Grid is set to the west end of this lower southern yard.

The access road passes from the eastern yard, through to the southern yard and then climbs back out to access onto the A520 Leek Road some 240m west of the existing Rix Garage using an existing track route to the earth dumping area. This westerly access is proposed as the permanent access to the works when it would become two-way in usage.

Other ancillary features include

Perimeter fencing – is located tight to the two BESS compounds, its type and height is indicated as ??
CCTV cameras are shown on the perimeter fences;

Acoustic barriers – are not indicated on the plans and may not be required but can be checked with the Applicant.

Switchrooms & Auxiliary buildings – are set throughout the proposals. None of the buildings appear to be traditional in architectural form or materials.

Water Tanks – Three are shown around the scheme and are indicated as 4.2m high and 10m in diameter.

Cut and Fill Plan – It is refreshing to see cut and fill proposals submitted with the BESS scheme particularly as it appears that major earthworks are required to form the eastern BESS compound. The quantum of material indicated appears to be broadly in balance meaning that it will be mostly retained on Site to lift the lower southern end of the fields up to create the proposed 1:30 gradient platforms.

The final two points to be raised with regards to cut and fill effects are;

- That the cut slopes will appear different and a uniform intervention compared to the natural undulating landform; and
- That the retention of material on Site in the form of the eastern field build up means that at the end of the operational phase the Site's reinstatement back to agricultural land should be more straightforward to achieve.

Landscape planting proposals – These are submitted on three plans which are reviewed in more detail in Section 8 to this note.

Colours and reflectivity of materials is not discussed in any detail; bright obvious colours such as white or cream would not be acceptable in this location. 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. Even

though there are lorry containers and HGV movements to the north the fields are still fundamentally rural in nature and usage.

The landscape effects will arise from;

- The removal of hedgerow sections to facilitate works;
- A notable change to the local sloping landform in the eastern field and to a lesser extent the southern lower field to create the flatter 1:30 battery yard platforms;
- Introduction of battery energy containers, the DNO substation, switchgear and auxiliary buildings and three large water tanks;
- The standalone nature of the proposals away from other power infrastructure;
- The requirement for acoustic barriers has been queried as they do not appear to be included when typically they are required in one form or another; and
- A change to the platform surface from pasture grass to what is presumed to be unbound stone.

The magnitude of landscape change across the Site is **Large** particularly within the eastern sloping field which will experience the greater levelling works. In landscape terms the regularity of the excavated slope and change to the overall landform would appear just as noticeable as introducing the BESS equipment into the pastoral landscape.

Combining a Medium landscape sensitivity with a Large magnitude of effect returns a **Major/Moderate, Adverse** landscape effect. This is the Year 1 effect when construction has stopped but the mitigation proposals have not yet started to take effect.

The proposals will effectively turn the main BESS Site fields into areas of electrical infrastructure. The DNO substation is set down at the lower southern field level reducing its visibility. With the mitigation proposals established there will be a reduction in the magnitude of landscape effects and for the Site I would judge it to be a **Moderate, Adverse and Long Term Temporary** landscape effect from Year 15 onwards.

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. 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 ability to remove the fixtures and fittings of the battery site. Returning the Site to matching the overall undulating landform of the area is not as easy as it will require the return of the excavated material e.g. pushing the lower southern side of the battery platforms back up the hill to fill in the higher parts of the slope.

The permanent track can be reasonably discrete in terms of positioning; adjacent hedge planting and a recessive colour of stone used for its surface and that of the internal tracks within the battery compounds. Of similar importance colour wise are the water tanks proposed for firefighting purposes. They are 10m in diameter and 4m high which given their regular shape, just like the battery and transformer containers will appear notable in the landscape. Colour choice is not stated on Masdar Arlington Dwg LEEK-D-SD-EXT-012 but should be non-reflective and avoid brightness in the landscape. The same need for recessive colours for containers and kiosks is required.

The proposals are not considered in keeping with the wider pastoral landscape character of the Dissected Sandstone Cloughs and Valleys LCT. The submitted LVA explains that the area also shows some characteristics of the neighbouring Settled Plateau Farmlands LCT which is a reasonable point to make. There is no visual precedent for the BESS from either Cellarhead sub-station, or any of the consented BESS sites in that area for this proposed land use in this location.

The inclusion of overtly regular and uncharacteristic built form within a rural, or as argued semi-rural landscape needs to be recognised and included in the landscape impact assessment. The fields will no longer appear as pasture fields and there will be the sense of an expansion of non-agricultural activity which will combine with the existing activity of the transport yard that is already a detracting feature within the local landscape.

On cessation of energy storage and the removal of BESS equipment, DNO substation, tracks and restoration of the sloping landform there would be a **Moderate/Minor, Beneficial and Permanent** landscape effect to the landscape around the Site. However, if the field levels are not returned to a similar form as the nearby sloping fields they will remain disturbed and odd flatter platforms within an undulating landscape. There is a foreseeable permanent adverse effect to the landscape of the Site from its topographical change to original ground form is not remediated.

Remediation of ground form brings in the spectre of tree removal in 40 years' time, just as they are truly established and having a meaningful effect on landscape character. To avoid wholesale removal in the future mitigation planting should be placed at field edges where re-grading works means they can be left insitu. It is only with their retention that a beneficial landscape effect would occur on the BESS' removal.

4. Visual effects from surrounding areas

There are several visual receptors that will experience change to their views and will benefit from the screening of the proposals to mitigate the visual intrusion and allow continued recreational and residential enjoyment of the area. The review of mapping and walking of footpaths suggest the visual effects on the following public and private receptors need to be taken into account;

Public viewpoints:

- Users of Footpath Caverswall FP 28 – mid range views from the east;
- Users of Footpath Caverswall FP 15 – mid range views from the south; and
- Road users on March Lane.

With regards to private views from residential locations the following potential views have been identified for consideration. These views were not taken by me and I cannot confirm that they exist:

- Western houses in Cherry Gardens;
- Western houses in Grove Court;
- Dispersed properties along the east side of A520 and
- Windcott Farm to the south.

I was not party to agreeing viewpoints with Rappor for the Application LVIA but the above public viewpoints are generally included in their LVIA. The LVIA only considers publicly accessible locations which it is directed to do by the GLVIA3¹. There is no need to consider residential receptors as they do not have a 'right to a view' in law. However some LVIA practitioners do consider private residential views for completeness and to allow definition of possible design alterations or mitigation.

Users of Caverswall FP 28 - Users of this local footpath already see the Shirely Transport Yard so their susceptibility to non-rural activity in their view is diminished. They will be able to look to the west for approximately 180m length as it follows the upward slope of the local undulation facing the proposed BESS at a distance of between 175m and 360m. This mid-range view to the BESS fields is partly screened

¹ Guidelines for Landscape and Visual Impact Assessments – Third Edition Landscape Institute and IEMA March 2012

by scrubby vegetation at the lowest point of the small valley near the brook that flows along it. It is the sloping eastern field that is more evident than the lower southern one that benefits from the scrubby vegetation.

Users of the path are considered to give the view a **Medium/High** value as they appreciate the view from this rural route and a **Medium** susceptibility given the presence of Shirley Transport leading to an overall **Medium** visual sensitivity. The magnitude of change experienced at Year 1 is judged to be **Medium/Large** as the proposals would be the focus of the view and appear unusual and incongruous in the scene. This results in an overall **Moderate, Adverse** effect at Year 1. At Year 15 with the benefit of established landscape mitigation planting the proposals would be less evident to path users so the magnitude of change would reduce to **Medium/Small** leading to an assessed **Moderate/Minor, Adverse and Long-Term Temporary** visual effect.

Users of Caverswall FP 15 - Users of this local footpath that leads in a roughly east west direction to the south of the BESS already experience the Shirely Transport Yard in pockets of view that are not contained by its hedges, copse or green lane banks. They will be able to look to the north to the proposed BESS at a distance of between 250m and 360m. This mid-range view to the BESS' southern field is largely screened by scrubby vegetation along the small valley near the brook that flows at the undulations base. Just like FP28 it is the sloping eastern field that is more evident than the lower southern one given lesser screening and it appearing higher in the view.

Users of the path are considered to hold the view in a **Medium/High** value as they appreciate it from a rural route and a **Medium** susceptibility given the presence of Shirley Transport leading to an overall **Medium** visual sensitivity. The magnitude of change experienced at Year 1 is judged to be **Medium** as the proposals would be the focus of the view and appear unusual and incongruous in the view. This results in an overall **Moderate, Adverse** effect at Year 1. At Year 15 with the benefit of established landscape mitigation planting the proposals would be less evident to path users so the magnitude of change would reduce to **Small** leading to an assessed **Minor, Adverse and Long-Term Temporary** visual effect.

Users of March Lane - Users of this local road which runs from the A52 to service Marsh Farm and lead onto Windcott Farm experience heavily screened views from running in a green lane with high adjacent hedgerows. Even if the hedgerows are reduced or laid the view to the BESS to the west is filtered through other layers of field boundary vegetation.

Users of the lane, including pedestrians are considered to hold the view in a **Medium** value as they appreciate it as a rural route leading towards rural features and have a **High** susceptibility given the lack of similar features leading to an overall **Medium/High** visual sensitivity. The magnitude of change experienced at Year 1 is judged to be **Small/None** as the proposals would not be the focus of the view and would appear to the very west of the view cone along the lane. This results in an overall **Minor, Adverse** effect at Year 1. At Year 15 with the benefit of established landscape mitigation planting the proposals would be less evident to path users so the magnitude of change would likely remain at **Small/None** retaining an assessed **Minor, Adverse and Long-Term Temporary** visual effect.

Residential receptors - The residential receptors that are listed above have been grouped together as one as they share a similar type of the view to the proposed BESS. The views are mid-distance in nature, from the rear of their properties, at first floor level and across existing field boundaries. These houses all tend to be on ridge level looking down towards the proposed Site, just from varying positions around the west and north sides of the Site. The one residential receptor to the south, Windcott Farm is slightly different in terms of looking across the undulating landscape instead of down into the little valley.

All residential receptors will consider the view from their property of **High** value to them. There is a degree of reduced susceptibility with the visual presence of Shirley Transport's yard in most of the views but it does not mean that there is automatically no vulnerability to other forms of development. I judge the susceptibility to be **Medium** given the extent of the rest of the view being rural in nature. This leads to an overall visual sensitivity of **Medium/High**.

In considering the residential receptors as a single group the following visual assessment is provided;

- Visual sensitivity of Medium/High (derived from High value and Medium susceptibility);
- Magnitude of change at Year 1 of Medium;
- Resulting significance of effect as **Moderate, Adverse**.

With landscape mitigation planting established the following assessment is made;

- Visual sensitivity of Medium/High still remains
- Magnitude of change at Year 15 predicted to be Small;
- Resulting significance of effect as **Minor, Adverse and Long Term Temporary**.

It is highly likely that the proposals cannot be fully screened for the residents around the Site. Parts of the BESS yards and DNO will remain visible but not necessarily dominate the view. Residential amenity of the local people living in these houses is not significantly compromised in terms of overbearance. However as asked above whether there is an audible intrusion from the units, particularly the transformers should be confirmed with the Applicant if not already done so. Any Noise Assessment should be for night time hours when the transport yard is silent and there is less passing traffic on the A52 and A520.

6 Cumulative effects

Cumulative effects are generally judged by taking into account three landscape and visual factors;

- Same view (the ability to see two or more developments from the same place in combination);
- Same position (the ability to see two or more developments from the same position but requiring the need to look in different directions); and
- Sequential view (where two or more developments are experienced by somebody moving through a landscape e.g. along a footpath or road).

There have been no cumulative visual effects identified. The proposed Site is of sufficient distance from Cellarhead Substation to prevent the sense of sequential views for footpath users and car users. There are intervening features including Werrington and Cellarhead houses and land uses between this location and the substation area which further add to the sense of perceived separation.

7. Review of submitted LVIA information

The LVIA undertaken on behalf of the Applicant was conducted by Rappor Landscape Architects and the P03 version issued for planning is dated 25 July 2025.

In broad terms it complies with GLVIA3 which is the guidance issued by the Landscape Institute to produce LVIA work. It has been informed by Zone of Theoretical Visibility (ZTV) (LVIA Appendix 8) and ground-truthing works and includes an appropriate level of representative viewpoints. Photography was taken in April 2025 just as deciduous trees, scrub & hedgerows were beginning to break into leaf.

Landscape effects - In considering the conclusions set in Section 11 the following section summarises landscape effects arising from the proposals;

11.5 In respect of landscape resource, it is considered that on balance, the proposals would result in Minor to Moderate (Adverse) Effects on the landscape resources of the Site. This considers the adverse effects on the topography and land use of the Site, against the beneficial effects created by the proposed boundary enhancements, tree planting, and wider improvements to the Green Infrastructure, which aim to contribute positively to the resilience and character of the surrounding landscape.

A **Minor to Moderate, Adverse** effect is reported. No time frame is reported. I consider this to be a slight under-assessment with my own judgement being a **Moderate, Adverse and Long Term Temporary** landscape effect from Year 15 onwards.

My observations on these points are;

- There will be an increased sense of non-rural development and activity in what is predominantly a rural location;
- The BESS containers are an incongruous element given their regularity of form and layout when compared to the contextual natural landscape to the east, south and west. It is just the transport trailers to the north that temper this effect;
- The ground modelling in an undulating landscape is extensive and will remain notable throughout the operation of the Site until it is remediated and put back to its former profile;
- The tree and hedge planting is an increase of these assets within the landscape and need to be carefully located so that they can be retained on decommissioning of the facility; and
- There will only be a long-term landscape benefit after 40 years on the removal of the BESS containers and retention of the established landscape planting.

Two further paragraphs from the LVIA's conclusions on the landscape effects are set below with three sections highlighted.

11.6 The proposed development would introduce new built form associated with battery storage infrastructure, replacing an area of pastoral land. However, careful siting of the battery containers, ancillary structures, and welfare facilities, combined with a strategic landscape framework, will assist in reducing the prominence of the built form within the wider landscape. The proximity of the Site to existing industrial influences further supports the ability of the development to be accommodated without causing significant disruption to the wider landscape character.

11.7 Development of the Site has been designed with sensitivity to the transitional qualities of the local landscape, with careful consideration given to the massing, layout, and form of the proposals to ensure that landscape and visual effects are effectively mitigated. The strategic planting proposals will reinforce landscape structure, promote biodiversity, and assist in protecting and enhancing the key characteristics of the surrounding area.

- Highlighting 1 – I have not seen within the LVIA explanation of why the assessors think it is carefully sited.
- Highlighting 2 – Nor have I seen description of how the design is sensitive to what is termed the 'transitional qualities of the local landscape' or compelling description or definition of what the transitional qualities are and how the design matches them.
- Highlighting 3 – I cannot see where in the LVIA process or in description of how the Landscape Architects have influenced the massing, layout and form of the proposals to evidence this assertion.

Visual effects - of the proposals are discussed in detail within LVIA Section 9 and final conclusions drawn in 11.8 as reproduced below.

11.8 The visual assessment has demonstrated that the Site benefits from a strong degree of visual containment within the wider landscape, with the most notable effects experienced in closer proximity, particularly to the south and southeast. Over time, the proposed mitigation planting will mature, contributing significantly to the softening of the development's appearance and resulting in a reduction in the degree of visual effects experienced by visual receptors at 15 years compared to Year 1. By in large potential to view the proposals is limited with only a few isolated locations experiencing limited opportunity to view the proposed built form, as well as from and along limited stretches of PRow to the south of the Site where the proposals are seen in the context of the Shirleys Transport yard and which appear contiguous with the current operations there.

My comments on these conclusions are;

- There is visual containment within the wider landscape but I think the description of strong is an over-emphasis with as the paragraph discusses openness to the south and southeast;
- Like most developments the most notable effects are in closer proximity but the primary visual receptors affected will see the proposals in mid-range views where they can judge the development set within a part rural – part transport infrastructure context;
- The proposed planting would assist in the assimilation of the proposals in a more structured landscape with a greater degree of planting and visual effects will reduce between Year 1 and Year 15;
- The concluding phrases and use of the word limited three times suggest that views are just that 'limited' but varying stretches of footpaths to the south and east on Footpaths Caverswall 15 & 28 are open. For example a 180m stretch of views from FP28 is not limited in nature. Intermittent may be a better adjective to describe the ability to see the proposals.
- That the visual presence of Shirley's Transport Yard does provide some visual context but the contiguous development will increase the presence of intrusive forms of development in the local area and this amalgamation should be recognised.

The description of Shirley's Transport Yard in Section 9 is sometimes given as 'industrial' or 'industrialised'. I think it should be recognised as transport infrastructure which like industrial activity in a rural area is generally intrusive and discordant but it is not producing any goods or influencing the landscape through large buildings or smoke stacks and the like.

The LVIA does not consider any representative viewpoints for residential receptors. At LVIA 9.4 it discusses the Zone of Theoretical Visibility (ZTV) and how it is used to identify potential change for visual receptors including residential properties. However the visual receptors in the remainder of Section 9 are all from publicly accessible locations. The LVIA is not mandated to consider views for residential receptors but it is sometimes useful to include them to understand which properties may or may not be affected and whether the effects are from principal rooms in the houses.

Green Belt Openness - Like many LVIA's considering BESS projects in a Green Belt location the Landscape Architects have assessed the matter of openness in terms of visual openness and its functions in the perception of openness following NPPG's direction of openness having a spatial and visual aspects. This review is in Section 10 of the LVIA in which they look at the five purposes of the Green Belt and draw conclusions on the Site's contribution to each.

- *To check the unrestricted sprawl of large built-up areas* – I agree that the Site does not currently play a key part in restricting sprawl from Stoke-on-Trent but foreseeably could become more important if the south side of the A52 is developed from Werrington.
- *To prevent neighbouring towns merging into one another* – I agree this is not applicable.
- *To assist in safeguarding the countryside from encroachment* – I consider that this proposal is encroachment of a non-rural use of the countryside. The LVIA recognises that the most recent Green Belt review identifies that this part of Green Belt Parcel S4 does make a contribution to preventing encroachment. The LVIA points to the temporary nature of the development and the ability to reinstate land back to its original state which is as pasture fields. The LVIA descriptor points to a degraded character at Site which I have not found to be the case. There is a dumping area to the south and the transportation area to the north but the Site fields themselves appear just as others in the area as pasture fields in an undulating landscape. Yes their character is affected by the immediate neighbouring land use but they themselves are not degraded. The discussion at 10.16 and 10.17 does not pass any conclusion on the significance of the effect on countryside encroachment but does state that there will be a loss with which I agree.
- *To preserve the setting and special character of historic towns* – I agree this is not applicable.
- *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land* – I agree this is not applicable.

The conclusions presented in the LVIA on Green Belt openness concentrate on the remaining character of Green Belt parcel S5 and how this will still function effectively. I also agree that it will fundamentally remain open and rural in character but the visual openness of this part of it will be removed given the quantum and repetitive nature of BESS development meaning that it will always appear as developed land until its removal and Site remediation.

8. Review of submitted landscape mitigation proposals

Three landscape planting plans are submitted. Generally the plant species selected are appropriate and native but I raise the following comments regarding some of their specific uses, management and end effects.

Plan 1 – shows an area of parkland to the north west where the proposed permanent access track is to run.

The hedge lining the access track is welcomed.

The parkland tree planting to the east is questioned. What is it trying to achieve? If it is trying to build up layers of vegetation in the landscape to screen the DNO Substation for instance then the number of individual trees and small groups is too low and spread out. There is no indication of tree guards or how the remaining field would be managed. It would be more effective to create a wooded belt closer to the A520 that can be properly fenced to allow grazing of the remainder of the field.

The reinstatement of the construction lay down area as wildflower meadow is beneficial from a BNG point of view but how will it be managed and kept separate from the remainder of the field that will likely be grazed at some point in the future?

Hedgerow tree standard planting is considered appropriate but some of the species choices – *Acer campestre*, *Sorbus aucuparia* and *Crataegus monogyna* are considered too small and uncharacteristic as hedgerow trees and bigger species are recommended to have more visual presence. The listed species are fine as hedge stock. This comment carries across the other two plans as well.

Plan 2 – Remediation of the construction access route – leaving it as an emergency access.

The cleared gap in the hedge has scrub planting shown to the west side but the gap to the east side left open. This should be narrowed down to a farm access width with replacement hedge planting, even a twin leaf farm gate to accommodate for the slanted route will be narrower than the gap that is currently indicated.

The choice of Beech (*Fagus sylvatica*) is questioned as a standard tree given the wet nature of the soils in this relatively high setting. Hornbeam is more likely to cope with the prevailing conditions but it too is not common in the area. This comment applies to all three plans.

Plan 3 – Lower southern Site with swales

The use of small groups of standard trees to the southern side of the lower battery yard is questioned – what are they trying to achieve? Larger species would be visually more noticeable or for better long term landscape benefit continuation of the woodland mix planting instead of a narrow area of wildflower seeding that will be more difficult to maintain compared to more open seeding areas. This area plays a significant role in screening the BESS containers from the south (Footpath receptors) and setting the proposed development within a landscape structure.

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 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 Site including the removal of all BESS equipment, transformers, DNO substation, tracks, tanks 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.

Much is made throughout the LVIA of the visual precedence and existing landscape character effects of the Shirley Transport yard to the north of the Site. However to me an opportunity appears to have been missed with landscape mitigation proposals for the BES scheme also doubling up to set the yard in structural landscape planting to ameliorate its own intrusive appearance. This could be explored with the Applicant further.

9. Suggested planning conditions

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

- A. Notwithstanding the existing planting proposals 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 planting 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. An elongated defects correction period is proposed given the importance of the proposed planting to the landscape and visual mitigation.*

- C. That no unconsented 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 – *Reason – to reduce the intrusive nature of lighting in the rural landscape in the hours of darkness.*
- F. That architectural elevations for all buildings and kiosks including those associated with the sub-station are submitted for and agreed by SMDC prior to any commencement on Site. The design intent, colour, finishes 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, any acoustic barriers, fencing, ancillary equipment and tracks as part of full restoration of the Site back to its current topographic levels and use as a 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 an energy 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 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

19/11/25

Rev	Nature of change	Prepared by	Checked by	Issue Date