

SMDC Planning Reference –	DOC/2025/0082		
Site Name –	Rownall Road BESS		
Summary of proposals -	Review of Landscape Design Proposals – Materials Management Planning Information		
Consultation Note Subject –	Landscape and Visual Matters		
Planning Case Officer –	Jane Curley – Principal Planning Officer		
Landscape comments prepared by –	Stuart Ryder of Ryder Landscape Consultants		
Date(s) of site visit —	2022 & 2024	Date of this response	7/4/26
Number / Purpose of note	To consider the submitted Materials Management Planning information submitted in October 2025 and March 2026 and whether it satisfies Conditions 15 of Decision Notice SMD/2022/0444.		
Summary of consultation response	• That the proposals for material management and bund formation are considered acceptable. • The proposals achieve an acceptable balance between engineering requirements and landscape mitigation.		

Dear Madam

Cellarhead BESS (Rownall Road side) - Landscape and Visual Consultation on Discharge of SMD/2022/0444 Planning Conditions 15 – Materials Management Planning.

Condition 15 – Materials Management Plan Condition

15. No development shall commence including site stripping and clearance until such time that a Materials Management Plan (MMP) that defines the excavation and bund formation processes and provides detailed drawings of the proposed raised earthworks has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out strictly in accordance with the approved details

Reason:- In the interests of the character and appearance of the area

1. Introduction

I have reviewed the submitted Materials Management Plan (MMP), Design Statement and associated engineering and landscape drawings in relation to the proposed Battery Energy Storage System (BESS) development at land east of Cellarhead Substation.

This consultation response addresses the landscape and visual implications of the proposals, with regard to the earthworks strategy, bunding, and any effects on the already approved mitigation planting.

2. Site Context and Baseline

The site comprises agricultural land located near to existing electrical infrastructure. The surrounding landscape is characterised by a rural field pattern with intermittent hedgerows and tree cover, and a generally open visual character at the local scale.

The proposals introduce a substantial engineered development including battery storage infrastructure, substation compound, transformers and associated infrastructure. These elements include vertical components (e.g. fencing, BESS cabins and plant) which have the potential to give rise to landscape and visual effects unless appropriately mitigated.

3. Summary of Proposals

The submitted documentation indicates that the development will be delivered alongside a Materials Management Plan prepared in accordance with the CL:AIRE Definition of Waste Code of Practice. This provides for the reuse of site-derived soils in the formation of earthworks and mitigation features.

The key landscape-related components of the scheme are:

- Formation of raised earth bunds around the site perimeter and adjacent to infrastructure;
- Use of excavated materials from on-site works to construct these bunds;
- Inclusion of mitigation planting, including native hedgerows, scrubs and tree belts associated with the bunds;
- Provision of acoustic fencing, palisade fencing and retaining structures within the site envelope.

The bunds are shown with variable width and slopes (generally up to 1:3), with planting indicated on and around these landforms.

4. Landscape and Visual Mitigation Strategy

4.1 Earth Bunding

The primary mitigation mechanism relies on the creation of raised bunds using site-won material. These bunds are intended to:

- Provide visual screening of infrastructure;
- Assist in acoustic attenuation;
- Establish a landform-based containment of the development.

From a landscape perspective, this approach is consistent with typical mitigation strategies for energy infrastructure in rural settings. The use of site-derived materials is also supported in principle as it reduces off-site disposal and aligns with sustainable construction objectives.

However, the effectiveness of the bunding is dependent on:

- The final height, profile and continuity of the bunds;
- Their relationship with surrounding landform;
- The degree of integration with existing field boundaries and vegetation patterns.

Taking the above criteria into account, I confirm the following matters in relation to the earth bunding based on the submitted MMP information by RSK Geosciences (October 2025) as updated with later clarification documents in March 2026.

Height – Varies across the Site but with a general height of between 2 and 2.5m above surrounding ground level which is above eye level which will assist greatly in the screening of views. The bunds height is maintained at the north west corner by the use of retaining gabions where there is insufficient width to create a typical 1:3 trapezoidal bund. This has been provided in accordance with previous Applicant discussions and prevents a dip in the bunding at the corner of the Site that would allow views through to the battery park.

Height of extended eastern bund – Is shown as 3.0m above existing ground level and it higher western end. This is sufficient to screen the battery units and security fencing set behind the bund.

Profile – There is a slight variation in the profile of the southern and western bunds with their varied width and for the more important southern bund a variation in the topline from 2.0 to 2.5m to reduce the artificial appearance of a flat line in the landscape. Working around the battery yard using the cardinal points the bunds have the following profiles:

North bund which is arguably the least in the public eye has a uniform 1:3 - flat crest -1:3 profile, it rises to 2.0m above ground level. This bund is acceptable in profile terms.

Eastern bund (as amended) – effectively takes up all the field to the east of the Site with suitable stand offs to retain the tree line to the immediate east of the battery yard. The front, east facing elevation of the bund that is visually the most important of all the bunds on the Site as it will be visible from Rownall Road runs at a shallow 1:10 gradient to reach a height of 3.0m. This alteration has been proposed to retain as much earth material on Site. The back of the bund is 1:3 and drops down to retained field level to retain the tree line. This bund is acceptable in profile terms.

South bund – has varied base width and as stated already a varied topline. The back of the bund is 1:3 as it is not visible. The footprint of the bund avoids the root protection areas (RPA's) of the trees lining the lane. The bund's profile is acceptable in profile terms.

West bund - has varied base width as it wends between RPA's of the tree line to the Site's western boundary. The back of the bund is 1:3 as it is not visible. The footprint of the bund avoids the root protection areas (RPA's) of the trees lining the lane. The bund's profile is acceptable in profile terms.

4.2 Mitigation Planting

Mitigation planting is proposed on and around the bunds, including hedgerow infill and tree planting.

5. Materials Management and Landscape Implications

The MMP confirms that excavated soils will be reused on-site under the CL:AIRE framework, subject to verification by a Qualified Person

From a landscape perspective:

- The reuse of materials to form bunds is acceptable in principle;
- It supports a landform-led mitigation approach;
- However, it places reliance on the accurate delivery of earthworks in accordance with approved profiles.

The predominant change between the original October 2025 MMP and the March 2026 iteration is the increase of material retained on Site in the eastern field. Native woodland planting as already proposed and discharged will still take place in accordance with the approved plans. The location of the woodland planting remains the same to maximise its screening value but it is just slightly elevated compared to the existing field levels.

When new earthworks are formed a key consideration is to establish a grass sward to help mitigate soil run-off and establish a binding grass root mat over the bunds. A deeper rooting grass mix is recommended to assist in the binding of the new eastern field's surface. For example:

- Tall fescue (structure + drought)
- Cocksfoot (depth + resilience)
- Small proportion ryegrass (establishment)
- Creeping bent (surface establishment)

- Red clover (soil improvement)

The proposed grass seed mix for the revised eastern bund should be confirmed and if this field area is not required for BNG scoring then I would suggest an agricultural pastoral mix would be best so it assimilates with other fields in the area. It is also recommended that a grass sward is established first say in the Spring after completion to allow the bund to firm up before planting of the woodland in the November or December of the same year. There may also be the need to hydroseed the bunds as apart from the eastern bund typical seeding equipment would not run on it given the side slopes. Also the eastern bund's upper topsoil horizon may not support heavier, agricultural seeding machinery immediately after formation. Hydroseeding by its nature of being deployed within a sticky spray mulch assists in keeping grass seed on sloping embankment faces and aids germination.

It is noted that surplus materials may be exported off-site, although this does not materially affect the landscape assessment of the application site itself. In landscape terms the minimisation of this is preferred.

In reading the Staffordshire County Council's Mineral Officer's consultation response dated ?? the Applicant is reminded that any use of site won sand that may exist in the weathered strata above the sandstone base geology will need to be the subject of another planning application.

6. Construction Considerations

The submitted risk assessments identify standard construction risks (e.g. excavation, plant movement, underground services), with appropriate control measures proposed. Whilst these matters are largely controlled through separate regulatory regimes, it is noted that:

- Construction activities will involve significant ground disturbance;
- There will be temporary adverse landscape effects during the construction phase.

These are typical for developments of this nature and are not considered unusual, subject to appropriate management such as controlling run-off or transfer of mud to the local highway network e.g. Rownall Road.

7. Landscape Effects – Professional View

Based on the submitted information, the following professional conclusions are reached:

1. The scheme adopts a mitigation-led design approach, with bunding and planting forming an integral part of the development rather than an afterthought.
2. The use of on-site materials to form bunds is appropriate and consistent with sustainable construction and landscape mitigation principles.
3. The development will introduce a noticeable engineered character into the rural landscape, particularly in the short to medium term before planting on the bunds takes effects and disguises their form.
4. The degree to which the development is successfully assimilated into the landscape will depend on:
 - Detailed earthworks design and careful implementation;
 - Quality and density of planting; and
 - Successful long-term landscape management.

8. Specific requests within the SMDC Instruction

As part of the review process SMDC set five questions to be considered, these were:

1. The acceptability of the bunds around the battery complex shown in the originally submitted MMP (Parts 2 – 10) i.e. not just the extended eastern bund.
2. Confirm that the extended eastern bund will not impede implementation of the approved landscaping scheme.
3. Confirm the shape of the eastern mound describing its form and maximum height and suitability in this location?
4. Review the cut and fill tables in the Addendum (March 2026) and cross reference them with the written overview of the earthworks operation to identify any anomalies or issues for delivery of the works.
5. Given that the proposed extended eastern bund extends over the previously retained field and its grass surface please consider what would be appropriate in terms of re-seeding it so it appears as part of the local landscape.

In responding to these specific points, I pass the following comments:

1 – Acceptability of the bunds

Recognising that Condition 15 extends across all bunds I have looked at each in terms of height and profile and as stated in 4.1 above I consider all of them acceptable. They will initially appear as man-made landform but they should perform their primary function of screening sight to the battery yard. This screening will only increase when the planting over them matures. On going establishment and aftercare of the planting has already been approved within the Landscape Management and Maintenance Plan but it is critical to deliver these works so the trees and scrub have the correct growing conditions to thrive.

The bunds' locations, particular the larger eastern bund that holds considerably more earth material than the other bunds combined will aid the re-establishment of the Site on completion of the facility's licensed period.

2 – Delivery of landscape scheme on extended eastern bund

The proposals to extend the eastern bund will not impede the delivery of the already approved landscape scheme, it simply raises it slightly to be implemented at a slightly higher level.

As discussed in Section 5 the landscape establishment may wish to concentrate on fixing the upper topsoil layer with a suitable grass mix before planting the already approved block of woody stock and individual trees. However both can be achieved in the same calendar year so there is no need for extended breaks between seeding and tree planting.

3 – Form and suitability of the eastern mound

The updated proposals change the form of the eastern mound for the benefit of the local landscape in my opinion. The desire to retain more cut material within the redline boundary of the Site has allowed the opportunity to create a more naturally appearing piece of landform than previously proposed. Its extension over effectively the whole field means that a much shallower average gradient of 1:10 can be presented to its eastern face to better address Rownall Road. At its shallowest near the Site entrance it is set at 1:13 and steepens to approximately 1:9 near the eastern field's south

eastern corner. Although still discernable as a slope this is a far more naturalistic slope to look onto than a 1:3 profile as previously proposed.

This shallow eastern face to the eastern landform runs for approximately 65m before reaching a flatter upper plateau level. This upper plateau level is generally 3.0m above original field level set at between 244.234 and 242.928 mAOD reading of the spot heights set around the edge of the plateau. This is not flat physically with a 1.3m fall across a width of 80 to 100m (effective gradient of 1:76) which to the human eye is perceived as gently falling, if not totally flat. This fall to the east will be useful to aid drainage from the top of the landform in that direction.

In looking at the other sides of the eastern landform the following matters are proposed:

- **North** – generally 1:3 slope that will appear to grown out of the shallower eastern face as it parallels the Site's access. It ties down to a flatter piece of ground that is proposed to set an avenue of trees next to a drain and the access track itself.
- **South** – the gradient steepens from 1:10 at the south east corner to form a 1:3 face as it runs parallel to the retained field hedge and tree line avoiding their RPA's it then links in with the southern boundary to the battery yard bund in a more organic landform with gentler leading edge gradients of between 1:11 and 1:17 at the head of the approved SuDS basin.
- **West** – this is the most uniform and least appreciable edge of the revised eastern bund. It is set at a uniform 1:3 slope but has a varied alignment to meander slightly in between the RPA's of the tree line to the east of the battery yard.

The clearest information is presented on Ameresco's own drawing 3001816-BMC-CS-XX-DR-CV-0050 Rev-0. This drawing is marked 'For Information' and may require updating to read 'For Planning' or similar to aid its enforceability or be explicitly referenced in any of your Decision Notices should you accept the revised proposals.

Overall, I think the eastern bund now it has taken on a wider landform is acceptable within this location. The disturbance and earthworks to create it will be more evident during the construction period as it would have a larger footprint and be nearer to Rownall Road but the long term effects are more natural and easier to assimilate into the local landscape.

4. Review of cut and fill tables

I have conducted a review of the cut and fill tables and supporting information in the Ameresco Document Addendum to MMP 11986 MMP01 (08) and found there to be consistency between that and the supporting drawings. The headline figure to note is that exportation of earth material from the Site has reduced from 38,775 m³ to 15,639m³ this is a projected reduction of 23,136m³. It should be noted that all figures are estimates.

In conducting the review four minor points became apparent to me:

The attenuation pond area in the south east field when scaled appears larger than 2000m² in plan form. Its area should be confirmed by the Applicant and whether this affects the volumetric calculations of how much cut will be removed from it. I recognise that the volume of the pond ties back to the Site's drainage facility and it could be that the indicated 3,400m³ of excavation is all that is required.

That in Section 3 that discusses the new form of the eastern bund / landform it states at Point i that woodland cannot go on the 1:3 slopes. Woodland can go on the slopes but its means of establishment

would be through seeding or the planting of whips instead of larger standard trees. This line should be struck through in case it is taken as a cue to avoid woodland development on other 1:3 slopes.

Again in Section 3 but at Point n the moving of the standard trees off the 1:3 west face of the eastern bund onto nearby flatter ground is acceptable and will have no effect on the overall landscape proposals. This point may have been the source of confusion for the Section 3 Point i statement discussed above.

I consider these four observations as minor points and can be confirmed by an exchange of e-mail with the Applicant or modification to the existing Addendum.

5 – Grass seed mix for eastern bund

As discussed above a grass seed mix will need to be confirmed for the new eastern bund. Mindful that SMDC nor ourselves are designers in this situation we would however recommend that the Applicant confirms with their own landscape advisors what the proposed seeding mix is. In doing this we would suggest consideration of the following:

- The value of establishing a grass sward quickly to minimise topsoil run-off from the eastern mound;
- A good mix of deeper rooting species to bind the upper topsoil horizon on the bund;
- That if the field is not required for BNG benefit that it is sown to an agricultural pasture mix to appear like other fields either side of Rownall Road; and
- That the method of grass seed broadcasting is confirmed given the newness of the eastern landform and its possible softness limiting the weight of agricultural or landscape plant that can be run over it.

I consider the naming of a recognisable pasture sward seed mix from an agricultural seed supplier and confirmation that it can be hydroseeded if required would clarify this matter.

9. Overall Conclusion

A. Acceptability in Principle

The proposed earthworks strategy, including the formation of perimeter bunding using site-won materials, is acceptable in principle from a landscape and visual perspective. The approach reflects a mitigation-led design, whereby landform and planting are integral to reducing the effects of the BESS infrastructure within a rural landscape context.

B. Effectiveness of Bunding and Landform Design

The revised bunding strategy, including the extended eastern landform, is considered to be appropriate in terms of height, profile and spatial arrangement. In particular:

- The height of bunding (2.0–3.0m) is sufficient to provide meaningful screening of the development;
- The eastern bund's shallower gradient (circa 1:10) represents a positive evolution in design, resulting in a more naturalistic and landscape-compatible form;
- The bunding arrangement successfully avoids key constraints such as tree root protection areas, maintaining existing landscape features.

Overall, the landform design is capable of integrating the development into the receiving landscape over time, subject to successful implementation.

C. Landscape Integration and Establishment

The long-term success of the proposals is highly dependent on landscape establishment and management. Specifically:

- The development will initially appear as a noticeable engineered intervention, particularly during the construction and early operational phases;
- The maturation of planting and establishment of a stable grass sward will be critical to softening the landform and achieving assimilation;
- The revised eastern bund offers improved opportunities for naturalistic integration compared to earlier proposals.

D. Materials Management and Earthworks Robustness

The updated Materials Management approach, which retains a greater proportion of excavated material on site, is supported in landscape terms. It reduces off-site export, enables a more coherent landform, and supports sustainable construction.

The review of cut and fill information indicates general consistency between tabulated data and drawings, with only minor clarifications required.

E. Landscape Delivery Risks

A number of manageable risks have been identified:

- Confirmation of grass seed specification and establishment methodology;
- Ensuring recycled Type 1 aggregate is visually appropriate and uncontaminated; and
- Clarification of minor technical matters such as pond extent and planting on slopes.

These do not represent fundamental constraints and are readily manageable.

F. Compliance with Approved Landscape Strategy

The extended eastern bund does not prejudice delivery of the approved landscape scheme. It maintains spatial planting arrangements and enhances screening effectiveness.

G. Overall Planning Balance

The proposals achieve an acceptable balance between engineering requirements and landscape mitigation. There is no overriding landscape or visual reason to resist the bunding and MMP proposals, subject to minor clarifications and adherence to approved management measures.

The scheme is suitable for approval from a landscape point of view subject to the final clarification of detailed specific points.

Stuart Ryder

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7/4/26