

[REDACTED]

Sent: 29 April 2026 10:07
Subject: FW: SMD/2024/0423 - Greenfields BESS Scheme

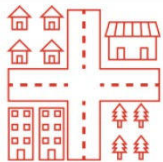
Hello

Please can the below be IDOX'd as SCC Minerals and Waste response.

Many thanks

Richard

Richard Wilshaw BSc (Hons) MSc PGDIP MRTPI



Richard Wilshaw
— TOWN PLANNING LTD —

Sent: 28 April 2026 11:41
Subject: RE: SMD/2024/0423 - Greenfields BESS Scheme

Hi Richard,

I would advise you to refer to our original response of the consultation and take into account experiences with similar proposals in the locality, the district planning authority needs to be assured prior to determination of the scale of likely effects of material movements including those required when the site is reclaimed. We cannot see that the applicant has provided a restoration concept for the site together with an indication of whether materials would need to be imported to achieve the proposed restoration.

It is a matter for the Local Highway Authority and District Planning Authority to determine whether the scale of lorry movements is appropriate in terms of highway safety, impact on the highway and the environmental effects of lorry movements.

A Detailed Material Management Plan (DMMP) should confirm the cut and fill volumes, the amount of excavated materials to be stored/ used on site and the amount to be disposed as surplus to requirements. Materials (top/ sub soils) required for reclamation of the site should be appropriately conserved and stored (refer to the [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#)).

Staffordshire County Council as the Mineral and Waste Planning Authority are satisfied with the wording of the condition for the Detailed Materials Management Plan.

Kind regards,

Isabelle



Isabelle Spencer

Senior Planning Officer

Planning Policy & Development Management

1 Staffordshire Place (Third Floor)

Tipping Street, Stafford, ST16 2LP

[Redacted]

[Redacted]

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Advance Notice of Leave : 7th – 25th May 2026.

[Redacted]

Sent: 22 April 2026 10:57

[Redacted]

Subject: RE: SMD/2024/0423 - Greenfields BESS Scheme

Thanks Richard,

Kind regards,

Isabelle



Isabelle Spencer

Senior Planning Officer

Planning Policy & Development Management

1 Staffordshire Place (Third Floor)

Tipping Street, Stafford, ST16 2LP

[Redacted]

[Redacted]

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Advance Notice of Leave : 7th – 25th May 2026.

[Redacted]

Sent: 22 April 2026 10:55

[REDACTED]
Subject: Re: SMD/2024/0423 - Greenfields BESS Scheme

Yes that's fine thanks Isabelle.

Richard

Sent from my iPhone

On 22 Apr 2026, at 10:42, Spencer, Isabelle (E, I&S)

[REDACTED] wrote:

Hi Richard,

Thanks for your email.

The additional information has been received but it is currently being discussed within our planning team.

Please could I request an extension of time to respond to this due to staff absence and leave? Could I request an extension of time to provide the response back to you by 01 May 2026?

Kind regards,

Isabelle

Isabelle Spencer
Senior Planning Officer
Planning Policy & Development Management
1 Staffordshire Place (Third Floor)
Tipping Street, Stafford, ST16 2LP

[REDACTED]
www.staffordshire.gov.uk/planning

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Advance Notice of Leave : 7th – 25th May 2026.

[REDACTED]
Sent: 22 April 2026 10:26

[REDACTED]
Subject: Re: SMD/2024/0423 - Greenfields BESS Scheme

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Hello Isabelle

I just wanted to check the below had been received okay?

Many thanks

Richard

Sent from my iPhone

On 9 Apr 2026, at 08:02, [REDACTED] wrote:

Hello Isabelle

This application was due to be heard at the March planning committee but was deferred due to several issues where it was felt that further scrutiny was required. One of those is the amount vehicle movements that would be required during the construction phase of the development.

The Applicant has done some further work below to quantify, as accurately as possible at this stage, the amount of material that would be exported from site and therefore the amount of vehicular movements this would create. I have highlighted this in yellow below. Proposed condition wording it also provided which we have drafted with the Applicant.

Please can you review this and provide your assessment and whether this raises concerns from your perspective.

Many thanks

Richard

Richard Wilshaw BSc (Hons) MSc PGDIP MRTPI

[REDACTED]
[REDACTED]

Sent: 02 April 2026 16:25

Subject: Greenfields BESS

Hi Richard

Response to Parish Council rep below – I have not repeated the material from your committee report or much of the application docs to keep it as concise as possible:

Fire Safety & Emergency Access:

1. No objection from the local Fire Service.
2. Separate emergency access for emergency vehicles is included as part of the Application.
3. The battery units are UL 9540A standard compliant, the most up to date NFCC position on BESS design, construction, testing, and decommissioning.
4. The spacings between batteries are compliant with NFCC guidelines.
5. On-site Standby supply of water – 24 on-site water tanks can supply 1.4 million litres of water. NFCC Guidance suggests a supply sufficient to provide 25 litres/second for 2 hours (180,000 litres), so there is plenty of on-site supply.
6. I suggest the current wording of Condition 27 is changed to Condition for a Battery Safety Management Plan can be added to the Decision Notice – see proposed wording below from our recent allowed appeal:
No development shall commence until a Battery Safety Management Plan has been submitted to and approved in writing by the local planning authority. The Plan shall prescribe measures to facilitate safety during the construction, operation and decommissioning of the battery storage system. The development shall be operated in accordance with the approved Battery Safety Management Plan at all times.
7. Fire and Rescue plan ('Emergency Response Plan') included via condition – see draft Condition 28

Landscape & Visual Impact:

1. Landscape impacts have been considered for the site and cumulatively – see ES landscape chapter and conclusions. Cumulative impacts assessed by landscape professionals and found to be acceptable. The PC can disagree with the Applicant and the Council's conclusions on landscape, but they provide no evidence substantiating their view, and no professional assessment of landscape harm has been completed. Only the Applicant and Council have completed these exercises and found the impacts to be acceptable.
2. No objection from Stuart Ryder Landscape Consultants – over 12 months collaborating with the Applicant on landscape design. Applicant has been very amenable to making changes to land on a landscape design that works for everyone.
3. Impacts associated with this application are, by definition, temporary.

Noise Pollution:

1. Cumulative effect of noise has been considered and found to be acceptable.
2. Noise levels controlled by condition and enforcement action can be taken in the event of non-compliance.

Traffic & Construction:

1. No objection from experts at County Council Highways re: Abnormal Loads and HGVs using the proposed Construction Route.
2. Based on the engineering drawings submitted with the application, some 26,662 m³ material will be moved from the site. It is important to note this figure is based on calculations for 1 landscape bund (a total of 3 are proposed) and does not allow for additional re-use / spreading of any excess materials on site. Therefore the 26,662 m³ material is an exaggerated “worse case” scenario and is likely to be closer to 22-23,000m³ once the detailed design works are completed prior to construction.
3. The excess material will be removed over a 8-week period (40 working days, not including weekends) and transported by either:
 1. 8x4 Rigid Tipper “8 wheeler” (payload c. 20 Tonnes, Cubic Capacity c.15 m³, sheeted cover system, typical dimensions L:9.2m, W:2.9m (inc mirrors), H:3m, or;
 2. 6x4 Rigid Tipper “6 wheeler” (payload c. 17 Tonnes, Cubic Capacity c.10 m³, sheeted cover system, typical dimensions L: 7.9m, W:2.9m (inc mirrors), H:3m
4. Assuming a conservative 10 m³ material per load, this equates to
 1. 26,662 m³ / 40 days = 667 m³ per day
 2. 667 m³ (per day) / 10 m³ per load = 67 loads per day
 3. Such a schedule would equate to a total of around 134 vehicle movements per day, or 8.5 loads (17 return trips) per hour.
5. As discussed above, this is considered to be a “worst case” scenario for an 8-week working timescale. The Applicant considers this impact to be acceptable.
6. Details relating to landscape bund design and structure can be secured in the Landscape and Ecological Management Plan to be submitted to and approved by the LPA as per the agreed condition. It is likely that more material can be retained on site.
7. Once cut-and-fill is complete, there are expected to be 10 HGV deliveries on a typical day during the construction phase, although there may be peaks and troughs during early mobilisation and demobilisation. This has already been considered acceptable by the Highways Authority.
8. The condition below is far more robust than other Materials related conditions for the other consented BESS projects nearby:

No development shall commence including site stripping and clearance until:

A). A Detailed Materials Management Plan (DMMP) has been submitted to and approved in writing by the Local Planning Authority. The DMMP shall be prepared following engagement with Staffordshire County Council Minerals & Waste and Staffordshire County Council Highways, with relevant evidence

demonstrating this engagement included within the DMMP. The DMMP shall include amongst other matters:

1. *Details of existing and proposed slab levels, based on detailed cut-and-fill drawings;*
2. *Details relating to any excavation (including detailed drawings and method statements) for the proposed raised bunds and excavated earthworks;*
3. *Information related to the movement of material within the site;*
4. *Details of where and, if appropriate, how excavated materials are to be stored;*
5. *Details of the intended use of excavated materials not used on site, (including evidence that the necessary planning permissions are in place or are not required) and how these materials will be transported; and*
6. *Contingency arrangements that must be in place prior to the movement of excavated materials off site;*

B). Details of the parties that will be involved with the implementation of the DMMP have been provided to the Local Planning Authority.

The development shall be carried out strictly in accordance with the approved DMMP. For the avoidance of doubt, all bunding shall be completed prior to first operation of the site.

Reason: *To ensure that the development integrates satisfactorily into its surroundings.*

(Based on our recent discussions, this condition should give members the comfort they need regarding Materials and Movements).

Waste water and Pollution

1. No objection to the development from Local Lead Flood Authority.
2. Proposed surface water drainage has been reviewed by experts at the County Council who conclude it is achievable.
3. The “developed” area for the BESS is underlaid with an impermeable liner, which collects all water and directs it to the storage areas. This runoff is stored onsite using the impermeable liners to prevent infiltration to the ground.
4. The attenuation basin outflow has a penstock isolation on the outlet to control flows to watercourses; this can be shut off to prevent water from entering the watercourse
5. The onsite attenuation has been designed to accommodate the additional firewater storage. Potentially contaminated water will be tankered away for disposal; this is a standard approach. There is no ‘segregation’ of fire water in an emergency event.

Necessity:

The National Planning Policy Framework (**NPPF, 2024**) is clear at Paragraph 168 a) that Applicants are **not required** to “*demonstrate the overall need for renewable or low carbon energy*” while elsewhere in Government policy,

such as the National Policy Statement (NPS) for Energy (EN-1) (**December 2025**) this position is further reinforced. It is stated, for example, in EN-1 that ***“the government considers that the need for such infrastructure is urgent”*** (Paragraph 3.2.1) and that *“It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure”* (Paragraph 3.2.4). These are the most up to date policy positions; heavily in support of these types of application.

No matter what the Parish Council write in their representation, the necessity of, or need for, any renewable or low carbon energy development is **not a matter for consideration** by individual Councils on each and every individual application, including this one.

Addressing the National Energy System Operator (NESO) Connections Reform process directly, the prioritisations by 2030 set are simply that. They are not “thresholds” above which Planning Permissions ought not to be, or could not lawfully be, granted. The Governments Clean Power 2030 Action Plan (April 2025) seeks 23 GW - 27GW of battery capacity by 2030, with further battery capacity needed by 2050. This significantly up from the 4.5 GW of battery capacity currently on the system and the delivery of batteries needs to be significantly expedited in the coming years.

The NESO Connections Reform process has identified the current queue of batteries as being *“significantly oversubscribed”* in the current CP30 aligned window of protections they, nor Government, have not changed the principles around need nor do they form an embargo on granting Planning Permission. In addition, as per the Connections Reform Methodology, the Greenfields project receives ‘Gate 3a protections’ in the event that Planning Permission is granted and future NESO protections windows given the length of time the application has been in consideration by SMDC. The NESO Connections Reform process is ongoing and not expected to be completed before September 2026.

A couple additional points to be addressed before the Committee Report is published for April:

1. BNG Figures – these need to be updated to 11.56% Habitat units improvement and 84.69% Hedgerow Units improvement.
2. GCN – please amend wording as previously discussed (survey results all negative)
3. Curlew and Skylark – please amend wording as previously discussed (not identified in our ecology surveys)
4. Flood Risk and Drainage section of the report needs to be revisited – is this based on a neighbouring scheme?
5. Water Supply figures need to be updated – see section above.

If you have any other queries on this, please let me know.

Have a good Easter Break.

Kind regards
Rich

Richard Moore
Principal Planner

Enso Energy Limited

Unit 1 & 2 Cirencester Office Park, Tetbury Road, Cirencester, GL7 6JJ.



Website: www.ensoenergy.co.uk

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