

Bagnall Parish Council objects to the application SMD/2024/0423 - Greenfields BESS

Bagnall Parish Council have recently considered the content of the supplementary statement created by Enso Energy dated the 2nd April 2026. We take issue with many aspects of the response. We will use the annotation from the Enso document (2nd April 2026) for the purposes of clarity.

Fire Safety and Emergency Access

1. **Applicant** No objection from the local Fire Service. **Response-** Staffs Fire and Rescue are not formally consulted and as a consequence they are not in a position to “object”. We note that the Scott type schedule or Planning Checklist is far from supportive of the scheme. The fire service point out, inter alia, *“Site layout shows groups of 4 battery containers within 3m of each other. This does not comply with NFCC guidance. Practically, this could prevent effective boundary cooling of neighbouring containers in the event of a fire.”* And *“Access to South compound does not appear to consider prevailing wind conditions”*.
2. In response to the condition for the BESS site to have 2 separate access points to the site to account for opposite wind conditions/ direction. The fire service make the following observation *“Only one access point to the south compound, splitting well within 25m of the nearest battery container. This would not allow clean air approach in the event of a Westerly to Southerly wind.”*
3. The battery units are UL9540A standard compliant. This is a testing process. The schedule quite clearly sets out the applicants position that the system design and construction has not yet been determined and their intention is to declare this in a later submission - Battery Safety Management Plan (BSMP).
4. In relation to separation (A standard minimum of 6m between units is suggested) the fire service make the observation *“Site layout shows groups of 4 battery containers well within 3m of each other. This does not comply with NFCC guidance. Practically, this could prevent effective boundary cooling of neighbouring containers in the event of a fire.”* The application shows twenty four water tanks spread around the site. From the figures quoted we extrapolate that each tank hold approximately 60,000 litres. We note that there are two tanks shown adjacent to the southern compound which would provide around 120,000 litres at this location. In their letter of the 11th March 2025 in relation to water supply Staffordshire Fire and Rescue make the following recommendations *“Specific consideration should be given to water supply resilience for firefighting and the terrain over which fire service vehicles may have to drive to access the site. This is particularly relevant where remote sites may have limited access to fire hydrants and where multiple vehicles may be required to ensure continuous water supply. Current guidance states the water supply should be able to provide a minimum of 1,900 l/min for at least 120 minutes. SFRS may wish to increase this requirement dependant on location and their ability to bring supplementary supplies to site in a timely fashion. Hydrants should be subject to suitable testing and maintenance by the operator. If a suitable pressure fed water supply is not available, then an Emergency Water Supply (EWS) meeting the above standard should be incorporated into the design for example, a water storage tank which would be required to be of a pumpable volume of 228,000 litres.”* The site does not have any hydrants and consequently we estimate that the volume of water immediately available to firefighters at the southern area falls some 100,00 litres short of the fire services recommendation.
We assert that given that the document is littered with phrases used by the fire service

such as “*Insufficient information to ascertain whether NFCC guidance will be met*” **Used twenty three times** and “*More detail required*” Bagnall Parish Council considers that the fire service is in fact not supportive of the development as it is currently presented and consequently there are grounds for refusal of the application on the basis that there are real objections to the development on the grounds of fire safety.

Landscape & Visual Impact. Bagnall Parish Council takes exception to the suggestion that only professionals can comment on the effects of cumulative impact. As a Parish Council we are, with others, at liberty to use the guidance set out in the National Planning Policy Framework (NPPF) to argue that the cumulative negative impacts of over-provision of BESS in the Cellarhead/ Rownall area heavily outweigh the renewable energy benefits. To support this premise we particularly note the high-profile rejection which occurred in South Derbyshire, where an appeal for a BESS was dismissed because the cumulative impact of multiple approved energy schemes caused unacceptable harm to the countryside. The sheer number of battery containers already approved in the above locality, in our opinion, risks turning rural farmland into a sprawling industrial corridor.

Noise Pollution

The applicant considers that the effect of noise is “acceptable” and then goes on to state that noise levels can be controlled by condition and can be subject to enforcement in the event of non compliance. So which is it? Either the applicant is certain that noise levels at the site will be low or in their words “acceptable” or in fact they lack confidence to determine overall noise levels with the result that neighbours are left at the mercy of the enforcements teams ability to have a noise nuisance abated. At this juncture it is worth reminding the reader that the fire schedule, available to view on the application website, states that the detail of the batteries, and other associated equipment has not yet been decided yet sweeping predictions are made here regarding its installation.

Traffic & Construction

To the statement “*The applicant considers this impact to be acceptable*” Bagnall Parish Council strongly disagrees. There is no mention where the material is to be taken to over the eight week period. We consider that this final location should be provided as without it the true nature of the distance/ vehicle impacts cannot be determined with any certainty. Even without this knowledge given the stated estimate of 134 vehicle movements a day we do not consider this to be acceptable as the vehicles would need to use narrow lanes in the parish.

Finally we note that the application is for some forty years. We read elsewhere that a Battery Energy Storage System (BESS) typically requires a full battery replacement or major augmentation every **10 to 15 years**. Because system degradation is highly dependent on usage we understand that some facilities undergo partial "augmentation" (adding fresh cells) every 3 to 5 years, while replacing the core battery cells entirely at the 15- to 20-year mark.

We further understand that supporting equipment like inverters and HVAC cooling systems typically require replacement every 10 to 12 years.

We are concerned that there is no mention of vehicle movements associated with this future activity in the application.

Waste Water and Pollution

We note that in the event of a fire the intention is to collect the run off water in an attenuation basin on site shared also with rainwater run off. The applicant advises that a penstock isolation valve on the outfall can be shut off to prevent water from entering the watercourse.

We are troubled by this statement. With no company personnel on site in the event of a fire who would activate the valve? Furthermore we read that Penstocks have a leakage allowance by design. Can we be sure that such a shared system would provide the necessary containment of heavily polluted fire fighting run off water?

Necessity

It is common ground that we acknowledge that the current queue of battery projects are “significantly oversubscribed”. (NESO connections reform.) We stand by our assertion that there is no requirement for this site given the overcapacity already in the system. It is alleged that the applicant has a “Gate 3a” protection which, from our reading of the relevant criteria, does not automatically provide a pathway to connect the site to the grid. [Clause 3a: projects which submitted an application for planning consent on or before 20 December 2024 and have not obtained planning consent before the closure of the G2TWQ application window – these projects, if they do not meet the Strategic Alignment Criteria, can reapply in a future application window (under the enduring regime) once they obtain planning consent and will be eligible even if they exceed the permitted capacities for the relevant technology;]

Bagnall Parish Council remains of the opinion that the application SMD/2024/0423 should be declined.