

23/01031/OUTM | Outline application for a 100 MW Battery Energy Storage System and associated infrastructure, planting and drainage. All matters reserved apart from access. Proposed Battery Storage Facility New Road Featherstone.

## Representations of CPRE Staffordshire, the countryside charity.

CPRE Staffordshire recognises that renewable energy has an important role to play in meeting future energy needs, and that battery storage technology is a key part of this process. Renewable energy helps increase energy security and diversity, while making a significant contribution to meeting the UK's net zero targets.

However, we believe that the environmental objective of developing renewable energy through battery storage facilities should not come at the expense of the beauty, character and tranquillity of Staffordshire's countryside. The impacts of such facilities with their associated infrastructure are difficult to mitigate in rural landscapes. The proposed development would have an adverse impact on what is currently a quiet semi-rural area.

CPRE Staffordshire believes that the most suitable locations for battery storage facilities would be on previously developed brownfield land, rather than in the Green Belt. South Staffordshire Council's Green Belt Assessment notes that this section of the Green Belt, S31, makes a strong contribution to preventing encroachment on the countryside. Development on this part of the Green Belt would significantly weaken the integrity of surrounding Green Belt land. We do not consider that very special cqircumstances exist to justify this inappropriate development in the Green Belt.

A similar application (21/00440/FUL) was refused planning permission on the grounds that the site was within the Green Belt and the proposed development was considered to be inappropriate development as set out in policy GB1 of the adopted Core Strategy.

Whilst it is appropriate from a national needs perspective for battery storage to be constructed close to existing National Grid facilities, there is normally no reason from the perspective of a local distribution network or a renewable generation connection why these facilities need to be located in the Green Belt and in rural areas. The National Grid can transfer any surplus or deficit electricity to or from a battery storage facility even if it is remote from wind and solar farms and points of demand.

The proposed development would also involve the loss of Best and Most Versatile (BMV) agricultural land (Grade 2/3a). CPRE believes that Grades 1, 2 and 3a agricultural land should not be used for renewable energy developments. Grade 1, 2 and 3a farmland is in itself a major renewable energy resource. It is undesirable to take one renewable energy resource out of effective use in order to develop another.



Please note that our comments relate primarily to planning issues. We recognise that local residents have raised other valid concerns, and hope that these matters will also be considered when making a decision on the application.