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Please ask for: Tom Nutt
Email: t.nutt@sstaffs.gov.uk

03 November 2023

Dear Sir/Madam

Development description: Proposed battery energy storage facility and substation with new access and associated fencing and landscaping

Location: Land On South West Side Of, Levedale Road, Levedale

Decision: An Environmental Impact Assessment is NOT REQUIRED in this instance.

Justification:

Schedule 1 Test – The proposed development does not fall within Schedule 1 of the Regulations as it does not fall within any of the categories listed.

Schedule 2 Test – The proposed development falls within Schedule 2 Part 3 (a) of the Regulations as it constitutes an industrial installation for the production of electricity, where the area of the development exceeds 0.5 hectares. The applications site area extends to approximately 3.7ha and developed area 2.7ha.

Sensitive Area Test – Advice in the National Planning Practice Guidance: Environmental Impact Assessment and Schedule 3 of the Regulations states that in determining whether significant effects are likely, the location of a development is of crucial importance. The more environmentally sensitive the location, the lower will be the threshold at which significant effects will be likely.

The site as determined against paragraph 32 of the NPPG is considered to be located in an area of low sensitivity. The reason for this opinion is as follows:

- The site falls within Flood Zone 1 and outside a Source Protection Zone.
- The Site is not located within the proximity of any SSSIs, Special Area of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, AONB or Scheduled Ancient Monuments.
- The Site comprises predominantly agricultural land AGL class 3b.

Threshold and Criteria Test –

The proposed development includes battery storage units, inverters substation, perimeter fencing, CCTV cameras, and an access track.

Battery storage issues and their effects are well understood and are not considered complex. Environmental impacts are considered to be generally low intensity. Given the nature of the battery storage element of the scheme, such does not produce any thermal outputs, steam, hot water, air pollution or require fuel and is designed to only store electricity for redistribution.

In terms of landscape character, the site is agricultural land within open countryside. The Site is not located within a densely populated area there are limited residential dwellings within the area surrounding the Site.

In terms of landscape and visual impacts and any impact on the open countryside, such may be managed, through (i) the existing mature screening that exists around the Site and (ii) a comprehensive landscaping scheme to seek to assimilate the Proposed Development into the landscape.

Having regard to the advice in the NPPG it is considered that the proposed development, does not in this instance, require an Environmental Impact Assessment. This decision has been arrived at for the following reasons:

- Paragraph 24 of the NPPG advises that “local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development”. The pending solar application and approved application at Coppenhall are assessed within the accompanying EIA Analysis. Given the separation distance (including landscape character and screening), it is unlikely there will be cumulative visual impacts.
- There are a no heritage assets within the site. However, there are Listed buildings nearby, but the site is not within the setting of these assets.
- Although the Site is not designated as having archaeological importance and there is a low likelihood of finds here, there may be some interest in terms of archaeology. This can be addressed through conditions requiring a scheme of investigation and mitigation (if needed) agreed with the County archaeological Team.
- The site is not considered to be environmentally sensitive as it does not lie within an AONB, SSSI, National Park or World Heritage Site and albeit that the site is located within open countryside, the impact of the scheme upon the area can be fully considered as part of the planning application process.
- The site lies within Flood Zone 1 where the main flood risk issue would be surface water run-off. These impacts can be managed through a Construction Environmental Management Plan (CEMP) and Detailed Drainage Strategy.

In light of the above, it is considered that the proposed development does not meet the criteria to require an EIA in this instance.

Schedule 3 Test – Selection Criteria for Screening Schedule 2 Development – The criteria through which Schedule 2 development should be considered, to judge whether the proposal is likely to have significant effects on the environment are; the characteristics of development; the location of development and the characteristics of the potential impact.

Characteristics of Development – Particular regard is advised to be had to:

- The size of the development

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- Cumulative impact with other development
- The use of natural resources
- The production of waste
- Pollution and nuisances, and
- The risk to human health

Location of Development – Particular regard is advised to be had to:

- Existing land use
- The relative abundance, quality and regenerative capacity of natural resources in the area
- The absorption capacity of the natural environment, paying particular attention to areas in wetland, coastal zones, mountain and forest areas, nature reserves, natural habitats, areas where environmental quality standards have already been exceeded, densely populated areas and landscape of historical, cultural or archaeological significance.

Characteristic of Potential Impact

Further characteristics to be considered when determining the characteristics of the potential impact are as follows:

- The extent of the impact (geographical area and size of the affected population)
- The transfrontier nature of the impact
- The magnitude and complexity of the impact
- The probability of the impact; and
- The duration, frequency and reversibility of the impact.

Environmental Test – The Site comprises agricultural land. Based on the information submitted, beyond localised visual impact there are no particular environmental impact considerations in this case. Whilst it is considered that these impacts would not be significant, if considering this development in isolation, the Regulations require the cumulative effects of the development to be considered. Having regard to other energy production and storage schemes consented in the area however, it is concluded that any environmental impact is unlikely to be significant, and therefore a formal Environmental Statement is not required.

Conclusions:

1. The development is not listed in Schedule 1.
2. The development is listed in Schedule 2 Part 3 (a).
3. The development is not in a sensitive area.
4. The development would exceed the relevant threshold, given its site area, as set out in the Annex to the NPPG (4-057-20140306)
5. Given the scale, location and nature of the development, the effects on the environment are unlikely to be significant, when assessed against the criteria identified within Schedule 3.
6. An Environmental Impact Assessment is therefore not required in this instance.

Report Prepared by: Tom Nutt (Senior Planning Officer)

Yours sincerely



South Staffordshire Council

Tom Nutt

Senior Planning Officer

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Environmental Impact Assessment (EIA) Analysis and Screening Proforma

Section 1: Analysis

Analysis		
1	Case Details	
a	Applicant case reference	
b	LPA case reference 23/00145/FUL	
c	SOS case reference	
d	Site Address Land On South West Side Of Levedale Road Levedale	
e	Brief description of development Proposed battery energy storage facility and substation with new access and associated fencing and landscaping	
f	Approval of reserved matters?	
	Yes	
	No	X
	Approval of conditions?	
	Yes	
	No	X
	If Yes , enter the description of development subject of the related planning permission	
g	Area of development/works/new floorspace (as appropriate) 3.7 ha.	
2	EIA Details	
A	Schedule 1	
(i)	Is the proposed development Schedule 1 development as described in Schedule 1 of the EIA Regulations?	
	Yes	
	No	x
(ii)	If Yes , under which description of development i.e. Nos. 1-21?	
B	Schedule 2	
(i)	Is the proposed development Schedule 2 development as described in Column 1 of Schedule 2 of the EIA Regulations?	
	Yes	X
	No	
(ii)	If Yes , under which description of development in Column 1 i.e. Nos. 1- 13? 3 (a) industrial installation for the production of electricity	
(iii)	Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations?	
	Yes	
	No	x
	If Yes , which area?	

(iv)	The closest 'sensitive areas' are stated below but are not within or partly in a 'sensitive area' as defined in Regulation 2 of the EIA Regulations.	
	The site is 8km south of Doxey and Tillington Marshes SSSI, 6.3km north east of Motte Meadows SSI and SAC, approximately 8km west of Cannock Chase SAC and AONB which includes Milford Quarry SSSI, Cannock Chase SSSI, Stafford Brook SSSI, Rawbone Meadow SSSI and Chasewater and Southern Staffordshire Coalfields Heaths SSSI.	
	The site is 5.9km south east of Allimore Green Common SSSI, 6km north east of Belvide Reservoir SSSI, 8.3km north east of Big Hyde SSSI, and 8.1km south west of Baswich Meadows SSSI.	
	Hay House moated site is a Scheduled Ancient Monument is 1.3km north east of the site.	
Are the applicable thresholds/criteria in Column 2 exceeded/met?		
(v)	Yes	Exceeded
	No	
(vi)	If yes, which applicable threshold/criteria?	
	Site area > 0.5 hectares	
3	LPA / SOS Screening	
All Applications including reserved matters and discharge of conditions		
(i)	Has the LPA issued a Screening Opinion (SO)?	
	Yes	
	No	X
(ii)	Has the SoS (GO) issued a Screening Direction (SD)?	
	Yes	
	No	X
(iii)	If yes, is a copy of the SO/SD on the file?	
	Yes	
	No	
(iv)	If yes, is the SO/SD positive?	
	Yes	
	No	
Reserved matters/conditions applications only		
(i)	Was the original PP subject to EIA screening?	
	Yes	
	No	
(ii)	Was a SO/SD issued for the original PP?	
	Yes	
	No	
(iii)	If yes, is a copy of the SO/SD for the original PP on file?	
	Yes	
	No	
4	Environmental Statement	
	Has the applicant supplied an ES for the current or previous (if reserved matters or conditions) application?	
	Yes	
	No	x
Completed by		
Name	Tom Nutt	
Date	03/11/2023	

Section 2 Screening Checklist

Questions to be considered		Likely/Unlikely – briefly describe	Is this likely to result in a Significant effect? Yes/No - why?
1	Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc)?	Likely – The Site comprises and agricultural land and therefore the proposal is a change in land use.	No – the physical changes to the locality would be limited and confined to a small agricultural field.
2	Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	Likely- will use materials in the construction of the battery store and associated infrastructure.	No. Construction would not use natural resources not known to be in short supply or non renewable in this area. The agricultural quality of land to be used is not in short supply in Staffordshire or on a wider area.
3	Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	Unlikely – it would involve the delivery and placement of lithium ion batteries and there is a potential risk of fire but this is unlikely.	No. Any application would be subject to a CEMP and battery safety management plan and the batteries would comprise systems for cooling them and design, protection, monitoring and suppression and containment measures. The risk of a fire or contamination is very low.
4	Will the Project produce solid wastes during construction or operation or decommissioning?	Likely – decommissioning will generate solid building waste.	No – Operational waste would be disposed of in line with Staffordshire County Council requirements and managed in accordance with all applicable legislation, including the recycling of materials where possible.
5	Will the Project release pollutants or any hazardous, toxic or noxious substances to air?	Unlikely. During construction, dust could be generated, additional emissions could be associated with the proposed development including vehicles travelling to and from the Site. This will be managed in accordance with standard best practice. There will be no emissions from the battery storage facility during operation and during construction, such will be temporary and not significant in nature. Construction will not require extensive use of noxious, toxic or hazardous chemical or substances. Any potentially	No. Emissions during construction would be temporary and not significant in nature. All works would be undertaken in accordance with best construction practices and pollution prevention and control measures, details of which would be provided in a Construction Environmental Management Plan (CEMP).

		<p>hazardous substances used during construction will be closely managed on site, with all operators following standard COSHH regulations, health and safety guidelines and trained in spill control measures. As such the installation of the battery storage facility is not expected to release pollutants or any hazardous / toxic / noxious substances to the air.</p>	
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Questions to be considered	Likely/Unlikely – briefly describe	Is this likely to result in a Significant effect? Yes/No - why?
<p>6 Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?</p>	<p>Unlikely. There is a potential for some noise effects associated with the construction of the development. This, however, can be managed in accordance with best practice measures and therefore are not anticipated to generate significant adverse effects. A degree of noise will be generated from the inverter/battery containers during operation and also during construction, but it is likely that any noise generated will be at low levels.</p>	<p>Noise generated from the inverter/substation/batteries during operation is likely to be low and localised. Noise impacts can be managed in accordance with best practice measures and therefore are not anticipated to generate significant adverse effects. The heat from batteries would be managed via cooling systems within the overall battery container limiting any release of heat externally.</p>
<p>7 Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</p>	<p>Unlikely. The Site is not located in either a high or low development risk area with respect to historical coal mining activity and is not located within an Air Quality Management Area (AQMA). A pond is located to the south of the site where runoff from the site would be discharged and on to the Whiston Brook.</p>	<p>No. There is very low risk of battery fire. In the unlikely event of a fire this would be managed through systems for cooling them and design, protection, monitoring and suppression and containment measures. In addition an emergency response plan agreed with the local fire service. Surface water runoff to the southern pond and Whiston Brook can be managed through design in accordance with best construction practices and pollution prevention and control measures, details of which would be provided in a Construction Environmental Management Plan (CEMP) and Detailed Drainage Strategy. The resulting impact is unlikely to be a significant effect.</p>

Questions to be considered		Likely/Unlikely – briefly describe	Is this likely to result in a Significant effect? Yes/No - why?
8	Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	Unlikely.	No. There are no areas on or around the site that known to be subject to pollution or environmental damage where existing legal environmental standards are exceeded.
9	Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	Unlikely if proper precautions are taken.	No - The site is well served and connected to the existing highway network. The routing of the construction related vehicles would be controlled through a Construction Traffic Management Plan (CTMP)
10	Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	Unlikely.	No.
11	Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?	Unlikely. There are a number of farmhouses within the wider area that are Listed Buildings. There are protected areas within the wider are but these are not considerde to be around the location. For the avoidance of doubt these are: The site is 8km south of Doxey and Tillington Marshes SSSI, 6.3km north east of Mottey Meadows SSI and SAC, approximately 8km west of Cannock Chase SAC and AONB which includes Milford Quarry SSSI, Cannock Chase SSSI, Stafford Brook SSSI, Rawbone Meadow SSSI and Chasewater and Southern Staffordshire Coalfields Heaths SSSI. The site is 5.9km south east of Allimore Green Common SSSI, 6km north east of Belvide Reservoir SSSI, 8.3km north east of Big Hyde SSSI, and 8.1km south west of	No. The site is not within the setting of these Listed Buildings and the distance of the site from other designations and nature of the proposal is unlikely to result in a significant effect.

		<p>Baswiche Meadows SSSI.</p> <p>Hay House moated site is a Scheduled Ancient Monument is 1.3km north east of the site.</p> <p>With regard to local designations, Levedale Marshes SBI is 1.5km north west of the site, The Whittamoors BAS 750m north east of the site, and Grasmere Farm (ponds north of) BAS is 1.2km south east of the site.</p>	
12	<p>Are there any other areas on or around the location which are important or sensitive for reasons of</p>	<p>Unlikely - See section 11. There are a number of ponds close to the site which have potential for Great Crested Newts.</p>	<p>No. Impacts on GCN can be managed through the District Licensing Scheme.</p>

Questions to be considered	Likely/Unlikely – briefly describe	Is this likely to result in a Significant effect? Yes/No - why?
their ecology e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?		
13 Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?	Unlikely. See section 10	No. Impacts on GCN can be managed through the District Licensing Scheme. Impacts on species and habitats can be addressed through a Landscape and Ecological Enhancement Plan and Construction Environmental Management Plan.
14 Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Unlikely. There is a farm pond to the south of the site.	No. Impacts on GCN can be managed through the District Licensing Scheme. Impacts on species and habitats can be addressed through a Landscape and Ecological Enhancement Plan and Construction Environmental Management Plan.
15 Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?	Unlikely. The closest landscape designation is the Cannock Chase Area of Outstanding Natural Beauty, located 8km east of the Site.	No.
16 Is the project in a location where it is likely to be highly visible to many people?	Unlikely – the site is naturally screened from most views.	No. The site is not highly visible to many people.
17 Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	Unlikely. Public rights of way are located to the south of the site it's route and views from it are unlikely to be affected by the project.	Visual impact to be assessed as part of the planning application process.
18 Are there any transport routes on or around the location which are susceptible to congestion or which	Unlikely. There are no known traffic issues around this location. Traffic levels associated with this type of development are low. HGV traffic during construction is likely to be a maximum of 3-4 per day for 9 months.	No. Any impact on traffic would be minor and temporary during construction.

Questions to be considered		Likely/Unlikely – briefly describe	Is this likely to result in a Significant effect? Yes/No - why?
	cause environmental problems, which could be affected by the project?		
19	Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	Unlikely. See 11.	No.
20	Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Likely – there would be a loss of approximately 2.7ha of greenfield land.	No. Any impact would not be significant in EIA terms, with this matter to be fully addressed as part of any planning application.
21	Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	Likely – agricultural land and a small number of residential properties along Levedale Road.	No. Any impact would not be significant in EIA terms, with this matter to be fully addressed as part of any planning application.

Questions to be considered		Likely/Unlikely – briefly describe	Is this likely to result in a Significant effect? Yes/No - why?
22	Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?	Unlikely	No
23	Are there any areas on, or around, the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project?	Unlikely – there are care homes along Levedale Road. There may be a minor impact (noise/traffic) from HGV's using Levedale Road during construction but this would be temporary.	No. Any impact would not be significant in EIA terms, with this matter to be fully addressed as part of any planning application.
24	Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	Unlikely	No
25	Is the project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No. Site located wholly within Flood Zone 1.	No
26	Are there any plans for future land uses on or around the location which could be affected by the project?	Unlikely - a solar farm is proposed to the south west but that project is unlikely to be affected by this project.	No
27	Are there any other factors which should be considered, such as	Unlikely - Paragraph 24 of the NPPG advises that <i>"local planning authorities should always have</i>	No.

Questions to be considered	Likely/Unlikely – briefly describe	Is this likely to result in a Significant effect? Yes/No - why?
consequential development which could lead to environmental effects, or the potential for cumulative impacts with other existing or planned activities in the locality?	<p><i>regard to the possible cumulative effects arising from any existing or approved development”.</i></p> <p>As stated above there is a solar farm application pending consideration to the south east of the site. A solar farm was recently approved at Land At Littywood Farm Toft Lane Copenhall ref 22/00936/FUL but that site is not visible from this site.</p>	No. Any impact would not be significant in EIA terms Any potential cumulative effects can be assessed through the planning application process.

B. CONCLUSIONS					
(i)	Schedule and category of development Schedule 2 - 3(a) Industrial installations for the production of electricity				
(ii)	Summary of features of project and of its location				
	<table border="1"> <tr> <td data-bbox="280 948 331 981">a</td> <td data-bbox="331 948 1998 981">Characteristics of development</td> </tr> <tr> <td colspan="2" data-bbox="280 981 1998 1050">Proposed battery energy storage facility and substation with new access and associated fencing and landscaping</td> </tr> </table>	a	Characteristics of development	Proposed battery energy storage facility and substation with new access and associated fencing and landscaping	
	a	Characteristics of development			
	Proposed battery energy storage facility and substation with new access and associated fencing and landscaping				
<table border="1"> <tr> <td data-bbox="280 1050 331 1083">b</td> <td data-bbox="331 1050 1998 1083">Location of development</td> </tr> <tr> <td colspan="2" data-bbox="280 1083 1998 1219">Land On South West Side Of Levedale Road Levedale</td> </tr> </table>	b	Location of development	Land On South West Side Of Levedale Road Levedale		
b	Location of development				
Land On South West Side Of Levedale Road Levedale					
c	Characteristics of the potential impact				

	<ul style="list-style-type: none"> The Site comprises agricultural land. Based on the information submitted beyond localised visual impact, there are no particular environmental impact considerations in this case. Whilst it is considered that these impacts would not be significant (in EIA terms), if considering this development in isolation, the Regulations require the cumulative effects of the development to be considered. Having regard to other similar schemes consented in the area however, it is concluded that any environmental impact is unlikely to be significant, and therefore a formal Environmental Statement is not required.
(iii)	If a SO/SD has been provided do you agree with it? Yes No
(iv)	Is it necessary to issue a SO/SD? Yes <input checked="" type="checkbox"/> No
(v)	Is an ES required? Yes No <input checked="" type="checkbox"/>

C. SCREENING DECISION (Indicate below which assessment applies)					
Assessment		Action (produce model letter 'x')		Response due from	Date response due
Sch 1 development		Issue positive or negative SO/SD			
Sch 2 development – threshold exceeded/criterion met/sensitive area and likely to have significant effects on the Environment		Issue positive or negative SO/SD			
Sch 2 development – not likely to have significant effects on the environment		Issue positive or negative SO/SD	x		

Sch 2 development but effects not clear at this stage – file to be reviewed at a later Stage		Review when appropriate – new info/case progresses			
Sch 2 but not EIA development – negative screening opinion - SoS agrees		No action required			
Sch 2 but not EIA development – positive screening opinion - SoS disagrees		Issue negative SO/SD			

Name	Tom Nutt
Date	03 rd November 2023