



Redditch Borough Council Reference: 25/00628/FUL
Application for Planning Permission for a
Battery energy storage system at the Saltway, Feckenham, near Ridditch, Worcestershire.

Shortened Public Summary of the Consultation Response
by Feckenham Parish Council

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1 INTRODUCTION

- 1.01 This document provides a shortened version of the Feckenham Parish Council's full **Consultation Response** to the Planning Application for the "*installation of battery energy storage system ...*", (Proposal), on 'land South of Salt Way, The Saltway Feckenham, Worcestershire' (Site). The Application is made by Genergy Renewables UK Ltd (Applicant). The Site, consisting of circa 2.7 hectares, is located on agricultural land approximately 1.3km east of Feckenham, near Redditch in Worcestershire. The Site is within the Redditch Borough Council area.
- 1.02 This document has been prepared for **Feckenham Parish Council** (FPC or the Parish Council) by Dr Christopher Ford, a Chartered Town Planner specialising in the spatial aspects of energy systems and energy policy.
- 1.03 This document sets out and discusses the relevant planning and energy policies and considers the effects arising from the Proposal in the light of the criteria set out in the policies. It commences by reviewing the Applicant's assessment of the planning policy context. It sets out the Government's energy policy, specifically considering the need for battery energy storage systems (BESS). The document considers national planning policy and guidance (relevant to the Proposal), before assessing the Proposal against the Development Plan. The document then weighs the planning balance for the Proposal, before culminating by presenting the conclusions to Parish Council's Response.

2 THE APPLICANT'S ASSESEMENT OF PLANNING POLICY CONTEXT

- 2.01 In the Applicant's Planning Statement set out various claims regarding benefits of the scheme, gives the Applicant's view of how the Proposal ties into Planning and Energy Policy and seeks to give the Applicant's justification of the scheme. Unfortunately, many, indeed most, aspect of this are incorrect and flawed.
- 2.02 The Applicant repeatedly refer to 'renewable energy', 'renewables', sustainable development, net zero, clean energy, addressing climate change and policies that provide for and deal with renewable energy. However, the Applicant fails to recognise that the Proposal is **not** a 'renewable energy' project. Accordingly, much of the Applicant's consideration of National Policy and Renewable Energy Policy, indeed most of Section 4 of their Planning Statement, is irrelevant to consideration of the Proposal.

- 2.03 The Applicant also repeatedly refers to national and planning policy in respect to 'electricity storage'. However, contrary to the position implied by the Applicant, much of the national policy relating to 'storage' and 'electricity storage' does not relate to Battery Energy Storage Systems (BESS) (which is the subject of this Application). Most of the national policy regarding electricity storage is not concerned with BESS. Much of the Applicant's reference to policy on storage is therefore not relevant to consideration of the Proposal.
- 2.04 In summary the Applicant claims inaccurately national planning policy and either misconstrue the value of the BESS proposal or misrepresent the role of BESS within the energy system.

3 ENERGY POLICY AND NEED FOR THE PROPOSAL

- 3.01 This section of the document considers energy policy, the Policy requirement for energy storage, distinguishes the role of BESS, considers the Government requirement for more BESS development and assesses the need for the Proposal.
- 3.02 The legislative basis of the UK in regard to Climate Change was set out in the Climate Change Act 2008. In 2019 the Government set a commitment to a 100% reduction in emission by 2050. Since the 2000s the Government has been encouraging low carbon energy, through policies facilitating renewable energy, and supporting lower use of energy and particularly lower greenhouse gas emissions. A key feature of this strategy has been to decarbonise the electricity system. Government policy continues to address the energy trilemma of balancing energy security, affordability and environmental sustainability. In recent years, consumer affordability has been particularly challenging.
- 3.03 Medium terms developments in the regulation of the energy system have been brought together in the Government's Clean Power 2030 Action Plan (CP30). As the CP30 subtitle states, this is introducing a 'new era of clean electricity'. The 'new era' is not only the desire for clean power, but a fundamental shift in the operation and regulation of the electricity supply industry. Rather than a developer-led system new development is being centrally directed, by NESO, to each region.

THE ROLE OF DIFFERENT TYPES OF STORAGE

- 3.04 In moving to a 'clean power' renewables energy system a number of structural problems arise with the system. Under a fossil fuel-based electricity system, generation could be called upon to be 'dispatched' as required to meet demand. Renewable energy only generates electricity when the resources (sun, wind etc.) are

available. Renewables therefore produce electricity 'intermittently'. Since this cannot match demand a system wide problem arises of a major gap in supply. To meet this gap, between intermittent generation and demand, some form of energy storage is required.

- 3.05 Currently there are many potential forms of energy storage possible. These include: battery, biomass, compressed air, flywheels, hydrogen, gas, geothermal, pumped storage hydro, liquid air and others. Others may develop. Many of these are struggling for commercial viability. The key energy system challenge for storage is to be able to provide energy when intermittent generation is not available. Analysis of long-term weather data shows these calms can go on for days, sometimes several weeks and occasionally months. Any energy system which cannot meet the demand for electricity fails on the first criteria of the energy trilemma, security of supply.
- 3.06 Thus, in an intermittent based energy system energy storage is vital. Given the dominant role that wind power will play in the future energy system there is need for long term energy storage, which can meet demand when there is no wind for several weeks or months. BESS, such as proposed in this Application, only provides storage for an hour or possibly two. BESS is therefore is not a solution and will not have a role in the storage requirement when there is no wind power for days and weeks.

THE GOVERNMENT'S 2030 PATHWAY FOR BESS

- 3.07 The key questions in relation to 'need' for this Proposal are: what are the Government's capacity requirements for BESS and what is the position in respect to meeting these targets.
- 3.08 Currently the UK has 4.5GW of operating BESS. For 2030 the Government species that between 23GW and 27GW of batteries is required.
- 3.09 Whilst the requirement for BESS by 2030 looks large; to assess the requirement for the Proposal, it is necessary to consider how much BESS development is taking place.
- 3.10 Data shows that currently nationally around 25% of the required capacity is already under construction.
- 3.11 The data also shows that planning permissions have already been awarded across the country for far more BESS capacity than the Government requires. There is therefore no need to award further planning permissions for BESS.
- 3.12 Similar figures have also been prepared for the local region, where there is a similar picture of need already being met.

4 NATIONAL PLANNING POLICY AND GUIDANCE.

4.01 Even were there to be a need for it, the Proposal requires to be assessed against the terms of the Development Plan and any other material considerations. This document moves on to consider the Proposal against the Development Plan. Before doing so the National Planning Policy Frameworks (NPPF) and relevant national guidance is considered.

NATIONAL PLANNING POLICY FOR BESS

- 4.02 At several points in their Statements the Applicant says that assessment of the Proposal should be considered against various terms of the NPPF, including that the planning system should support the renewable and low carbon development. They refer to “*renewables developments*” similar terms. However, the Proposal does not provide for ‘renewable and low carbon energy’ and has an insignificant role in the energy transition. These sections of the NPPF referred to by the Applicant have no relevance to the Proposal. Furthermore, the NPPF makes no provision for batteries or BESS.
- 4.03 The Planning Policy Guidance (PPG) on ‘Renewable and low carbon energy’ (2023) does include mention of BESS. However, in setting out the “*planning considerations that relate to specific renewable energy technologies*” this only covers “*hydropower, active solar technology, solar farms and wind turbines*”. Accordingly, the PPG does not treat battery energy storage systems as a renewable technology.
- 4.04 Specifically, the PPG highlights the risk of BESS, in relation to fire safety. Experience has shown that BESS, such as this Proposal, are liable to spontaneous fires that result in thermal runaways. Given the dangers of this experience the Department recognised that it was necessary to ensure that fire risk was adequately dealt with when considering planning applications for BESS.

5 COMPLIANCE WITH THE DEVELOPMENT PLAN.

- 5.01 Having covered national planning policy and guidance this document now turns to the Development Plan. The Local Development Plan (LDP) is the central document for this.
- 5.02 The Borough of Redditch Local Plan, No 4 (LDP) was adopted in 2017. Similar to NPPF and national guidance it makes no specific provision for BESS. The expressed LDP definition of ‘renewable energy’ does not extend to BESS (p146). The LDP provides a definition for ‘carbon neutral’ (p141), which the Proposal does not meet.

- 5.03 Given the location of the Proposal, south of the Saltway and the green belt perimeter, the most relevant LDP policy for the Application is Policy 9 Open Countryside. This states that development “*will not be permitted except where it is:*” i) clearly necessary for agricultural purposes; ii) it supports small scale recreation; iii) it is an necessary accompaniment to a new enterprise “*which itself needs to be located outside a settlement*”; iv) an acceptable reuse of existing buildings; v) a replacement of an existing building; vi) an extension to an existing building or appropriate scale; and vii) in accordance with the settlement hierarchy. The Proposal does not qualify under any of these terms. Therefore, under the terms of Policy 9 the Proposal is not to be permitted.
- 5.04 In respect to any claim the Applicant may seek to make regarding clause (iii) ‘necessary to an enterprise which needs to be located outside a settlement’, BESS can be and is frequently located within settlements. It is also noteworthy that the Applicant’s own wording in relation to Policy 9 confirms this. The Planning Statement says only that BESS “*are often confined to open countryside locations*” (5.23) (author emphasis). ‘Often’ certainly does not mean BESS cannot be located in settlements. The Applicant does not claim that BESS “*needs to be located outside a settlement*” or that BESS has to be located in open countryside. The terms of Policy 9 are clear and binary.
- 5.05 In respect to the Applicant’s reference the Great Barr planning appeal (3347424), they fail to recognise that there are many grid ‘points of connection’ across the country and the majority of these are located within settlements. The circumstances and Development Plan policies for the Great Barr case are different to the current case. For example, the Great Barr case utilised ‘grey belt’, whereas this Proposal is in ‘open countryside’. In any event, each case needs to be considered on its own merits ¹.
- 5.06 As stated previously in regard to national policy, the Applicant’s remark in relation to LDP Policy 15 Climate Change, are misleading as the Proposal does not provide for renewable generation or address climate change.
- 5.07 The Applicant’s proposals in regard to landscaping and biodiversity are noted. However, the scale of the landscaping provision is needed due the core of the development, the BESS, being alien to the setting in which it is being proposed. The Proposal is an industrial development within the open countryside and far from an urban settlement. The landscaping seeks to camouflage it. Whilst this is maturing,

¹ Also, given the nascent nature of BESS development, the absence of national policy support, and the new CP30 Policy, it is unwise to rest on Appeal decisions. With due respect to the Inspectors concerned in the cases cited by the Appellant (and noting that the Applicant will not cite cases which are contrary to their interest), the “*great weight attached to the contribution to climate change and to energy security*” and similar wording used by other Inspectors cited is arguably considerably overstated and probably misunderstands the role of BESS.

where any gaps arise and during construction the alien industrial structures will seriously detract from the current high quality natural open countryside. The Applicant has not *“demonstrated how the use of natural resources has been minimised”* in the core use of lithium, steels and other materials in the development, in accordance with Policy 16.2(i).

- 5.08 The LDP has policies which are designed to protect and enhances Redditch's historic environment. These seek to *“promote and ... enhance the quality of the Borough's landscape and ... distinctive features”*. Heritage *“contributes to the Borough's local character”*. Far from least amongst the Borough's heritage assets is Feckenham Parish. Under Policy 38 the LDP recognises the Feckenham Conservation Area. This requires developments to *“conserve and enhance the Feckenham Conservation Area by supporting proposal which complement and improve the existing character and appearance of the area”* (Policy 38.8). As the Conservation Area Appraisal identifies Feckenham has existed as a settlement since roman times and has an important extensive complex history. Whilst the Proposal falls outside the Conservation Area it is within the Feckenham Parish Council area. As the Area Appraisal confirms the Saltway is an integral part of the settlement's history. As such the Site for the Proposal contributes to the setting and surrounding of the historic settlement of Feckenham. The Saltway and its rural character is central to the core of the Feckenham heritage assets. Indeed, in heritage terms, the Saltway almost has greater historic importance. As an industrial development the Proposal is clearly incongruous to the rural character of the Saltway, the Feckenham area and village setting. The Proposal does not 'conserve and enhance' the area and these valued heritage assets.
- 5.09 The Applicant's information and statement in regard to potential archaeological remains on the Site are insufficient. Given the considerable potential for heritage assets at the Site, from the Saltway and local historical potential, this requires further investigation, prior to determination of the Application.
- 5.10 The Applicant's Planning and heritage statements identify that the Site is within 150m of Shurnock Court, a Grade II listed building complex, as well as close to other listed buildings. As such the Site affects the setting of an important heritage asset. The setting of this listed building includes the agricultural land around it, with which it is intimately connected. Only around 6% of listed building categorised as Grade II in the country. Whilst the Applicant recognises the significance of the Shurnock Court insufficient regard is paid to the Proposal's impact upon on it. The Applicant inappropriately downplays this. As Historic England have observed in their consultation response (Ref. P01593538 23/6/25), consideration of the adverse effects of the Proposal have to be judged against the potential need for the development. The Applicant accepts that 'heritage harm' is created by the Proposal. However, in the planning balance they set this aside because of their claimed need. As made explicit in

this submission, the Applicant's claims in respect to need for this Proposal are deeply flawed and not sustained by the evidence. Consequently, the Proposal does not meet the appropriate tests, in Policy, and is contrary to LDP Policy 36. This states *"designated heritage assets including listed buildings, structures and their settings ... will be given the highest level of protection and should be conserved and enhanced."*

- 5.11 As set out above, the PPG points out the particularly hazards of BESS developments in regard to fire risk and subsequent thermal runaway. Specific care is required for this and the local fire and rescue service need to carefully consider the requirement to safeguard the site. It is noted that these requirements have been tightened recently, including the need for immediate access to water for fire suppression. This can mean the storage of very large volumes of water within the development. The consequence of this risk is not only a fire itself, but the potential for chemical contaminants to sterilise the ground and seep into water courses.
- 5.12 The LDP Policy 2 gives a clear Settlement Hierarchy for the Borough, with urban Redditch, sustainable Astwood Bank and the rural settlement of Feckenham. Beyond this the LDP sees 'rural areas' with sparse local hamlets where any development is for *"locally identified need only"*. For rural areas the LDP says only development for *"proven local need"* is acceptable. The Proposal is in a rural area and is not for a local need. Accordingly, the Proposal fails to comply with Policy 2.
- 5.13 The LDP makes ample provision for 'employment land' and commercial developments opportunities. These are within urban settlements. As an industrialised development the Proposal would be suited to these locations. There are electricity grid points of connection within these settlements. There is ample opportunity for the Proposal to be located within settlements, on commercial land, within the Borough.
- 5.14 It is known that there are several other BESS proposal which have been or are being considered by developers for the Feckenham area, including where local public consultation has taken place. These are seeking to utilise the proximity of the area to the Substation and the point of connection. Whilst each case needs to be determined on its own merits, it likely that any planning permission for BESS in the vicinity of Feckenham would be seen as a setting a precedent for similar developments. In such circumstances it is appropriate for a cumulative assessment of the impact on the open countryside, the green belt and the setting of the conservation village of Feckenham.

6 WEIGHING THE PLANNING BALANCE FOR THE PROPOSAL

- 6.01 Overall, the balance of the planning judgement for the Proposal shows that: (a) there is no express or tacit support in the NPPF or other national planning policies and

guidance for this type of development; (b) the Proposal fails to comply with the requirements of LDP Policy 9 Open Countryside; (c) The Proposal would have significant adverse effects on heritage assets, include listed buildings, the setting of Feckenham village and change the character of the Saltway; (d) the Proposal does not comply with LDP Policy 2 on the settlement hierarchy; (e) the Council has made provision for employment and commercial land within the Borough, where this Proposal would be better suited, and; (f) various other matters which need predetermination consideration and resolution.

6.02 Therefore, the Proposal does not accord with the Development Plan.

6.03 In respect to the need for the development claimed by the Applicant that need has been met. The Applicant's claim are not supported by the evidence. Contrary to the position implied by the Applicant, the requirement for battery energy storage systems is not unlimited. The Government has set out crystal clear and fully quantified target requirements for batteries. The Government's own data shows that that the full requirement has already been met and is more than fully provided for. There is therefore no further need to award more planning permissions for battery energy storage systems within this region. There is therefore no material consideration or other circumstances in which this Proposal needs to be awarded planning permission. Weighing all of this, the Development Plan criteria should be applied as the Proposal is not needed.

6.04 Consequently, when all of the merits of the proposal are weighed in the planning balance the Proposal should be refused planning permission.

7 CONCLUSION

7.01 The Feckenham Parish Council has taken great care to consider the merits of the Application. This has taken account of the information provided by the Applicant, local and national planning policies as well as the wider objective of addressing climate change. The Parish Council supports addressing climate change, local and national planning and energy policies. The Parish Council has commissioned independent expert advice to fully understand the circumstance surrounding the Proposal. This advice clearly shows that the Applicant's claim for any need for the Proposal are ill founded. Accordingly Local Development Plan policies are the determining matter in this case.

- 7.02 The Parish Council is aware of several potential battery energy storage developments being considered for the Feckenham area. It is concerned that this Proposal, with or without similar proposals, will change the character of the rural setting of the historic village of Feckenham.
- 7.03 In conclusion, the Feckenham Parish Council responds to the Consultation by calling on the Borough Council to refuse planning permission for this Application (25/00628/FUL), by Genergy Renewables UK Ltd, for 'battery energy storage system with access and associated infrastructure' on 'land South of Salt Way, The Saltway, Feckenham, Worcestershire'.

CDF for FPC
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