



Redditch Borough Council Reference: 25/0088/FUL
Application for Planning Permission for a
Battery energy storage system at the Wheaton Hill, Astwood Bank, near Ridditch, Worcestershire.

Shortened Public Version 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 at Wheaton Hill Farm, Astwood Lane, Astwood Bank, Worcestershire' (Site), under Redditch Borough Council reference number 25/00888/FUL (Application). The Application is made by Boom Developments Ltd (Applicant). The Site, mostly consists of agricultural land located at Wheaton Hall Farm situated approximately 2km east of Feckenham.
- 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 Design and Access 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. It is plain to anyone who has been heavily engaged in the energy system for over a decade, that, with due respect to them, the author of the Applicant's Statement does not understand the energy system. Parts of their Statements are technically illiterate, with other misrepresenting its value.
- 2.02 The Applicant also misrepresent the position of BESS proposals in respect to Planning Policy. For example, they repeatedly claim that BESS is renewable generation, when it

is not. BESS merely stores energy whether that is fossil fuelled base load or from low carbon. The Applicant repeatedly suggests that there is strong policy support for their proposal. However, that is a misrepresentation of the position. The Applicant also repeatedly conflates the need for BESS with the wider need for energy storage.

- 2.03 The Applicant also makes claim in regard to economic benefits and social benefits of their proposal. For example, suggesting the proposal would help address fuel poverty. Such claims are clearly spurious.
- 2.04 The Applicant claims the Proposal “*will not alter the planning status of the land*”. That is plainly incorrect, as for the forty-year life of the development that status would be changed. The Applicant acknowledges that the “*proposed Site is not previously developed land*” (11.3.6). The Proposal must result in the ‘planning status of the land’ changing.
- 2.05 Whilst the Applicant’s Statement extensively refers to the electricity grid, it does not state whether or not the Applicant holds a necessary licence and has a ‘grid connection agreement’, to connect to the electricity grid to facilitate the services the Proposal would seek to provide.
- 2.06 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 CLARITY ON THE PROPOSAL SITE

- 3.01 There is also doubt over whether Proposal Site Boundary, provided by the Applicant, accurately delineates the site. The Applicant says, the marked *red line boundary includes Feckenham substation*. However, this does not form part of the ‘development’.

4 ENERGY POLICY AND NEED FOR THE PROPOSAL

- 4.01 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.
- 4.02 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, as international gas prices have driven up wholesale electricity costs, consumer affordability has been particularly challenging.

- 4.03 These 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

- 4.04 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.) is 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.
- 4.05 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.
- 4.06 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

- 4.07 The key questions in relation to 'need' for this Proposal are therefore: what are the Government's capacity requirements for BESS and what is the position in respect to meeting these targets.
- 4.08 Currently the UK has 4.5GW of operating BESS. For 2030 the Government species that between 23GW and 27GW of batteries is required.
- 4.09 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.
- 4.10 Data shows that currently nationally around 25% of the required capacity is already under construction.
- 4.11 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.
- 4.12 Similar figures have also been prepared for the local region, where there is a similar picture of need already being met.

5 NATIONAL PLANNING POLICY AND GUIDANCE.

- 5.01 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 Consultation Response now 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

- 5.02 At several points in their Planning Access and Design Statement the Applicant states that assessment of the Proposal should 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.

- 5.03 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.
- 5.04 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.

GREEN BELT POLICY

- 5.05 The Proposal is located in the Green Belt. National planning guidance in regard to Green Belt is set out in the National Planning Policy Framework (December 2024), chapter 13 'Protecting Green Belt Land'. Further policy guidance is given in the Planning Practice Guidance (PPG) on 'Green Belt' (February 2025).
- 5.06 The Framework identifies (143) that Green Belt serves five purposes: (a) to check unrestricted sprawl; (b) to prevent neighbouring towns merging; (c) to safeguard the countryside from encroachment; (d) to preserve historic towns settings and character; and (e) to encourage urban regeneration.
- 5.07 For development proposals which affect the Green Belt *"substantial weight is to be given to any harm to the Green Belt including harm to its openness"* (153). The Framework recognises that *"inappropriate development is by definition harmful to the Green Belt"* (153). Therefore development *"should not be approved except in very special circumstances"*. *"Very special circumstances (VSC) will not exist unless the potential harm ... is clearly outweighed by other considerations"* (153). The Framework identifies exceptions where development would not be inappropriate (154). These include agricultural building, various other building relevant to green belt areas, existing buildings¹. This list includes *"other forms of developments provided they preserve"* green belt openness and do not conflict with the purposes of it.
- 5.08 The Applicant argues that the Site is 'grey belt', that there are very special circumstances, that the Site does not have significant value in respect to Green Belt purposes and that there is unmet need for this type of development (BESS).
- 5.09 Taking these in order, the first question that arises is whether the Site is 'grey belt' or not. The Site has not been 'previously developed land' and, as agricultural land, the

¹ See Framework paragraph 154 for the full terms.

Site is continuing to serve its long-term purpose as a functioning part of the green belt. There is also an arguable case that, if consented, the Proposal would set a precedent for similar developments and, given the volume these and being essentially urban in nature, they would create essentially create urban sprawl. The argument that the Site is 'grey belt' is extremely doubtful.

- 5.10 The Applicant's case that there are very special circumstance here is also inconsiderable doubt. This Proposal would change the character of the area. As such the Proposal would 'fundamentally undermine the purpose of the Green Belt across the plan area'. In any event very special circumstances only applies where there is unmet demand.
- 5.11 The argument that the Site does not significant value in respect to Green Belt purpose is based on the notion that there is lots of other location which would sustain the Green Belt. Essentially, they are arguing that if the BESS was approved the Green Belt would remain elsewhere. That argument could be applied to any proposal in the Green Belt. However, the value of the Green Belt is that it is a belt, that is a large extended area around cities, which are not developed. In reality, if this Proposal was approved it would set a precedent for more similar developments, more BESS, around Feckenham. Such development would fundamentally erode the Green Belt.
- 5.12 The foundation of the Applicant's argument in respect to Green Belt is that there is 'unmet demand' for BESS and that it is important to meet this need for BESS. As set out above, the Applicant has arrived at this view, which is obviously convenient to their case, by blinkering themselves to the facts. They have not properly assessed the need for BESS. They have simply taken an apparently large number, for the BESS required by the Government, but ignored the inconvenient facts. However, as the data and analysis here shows the need for BESS is already being met. There is no need for more planning permission to be awarded to BESS proposals. Accordingly, the Applicant's arguments to justify their proposed development in the Green Belt, is ill founded.

6 COMPLIANCE WITH THE DEVELOPMENT PLAN.

- 6.01 Having covered national planning policy and guidance this Consultation Response now turns to the Development Plan. The Local Development Plan (LDP) is the central document for this. As can be seen an important part of the LDP is Green Belt policy. This reflects the national policy on Green Belt, discussed earlier.
- 6.02 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.

- 6.03 LDP Policy 8 sets out the location and extent of the Green Belt in the Borough. The site lies within the designated Green Belt area. Given the location of the Proposal, the Proposal is subject to LDP Policy 8 Green Belt. Policy 8 states that the boundaries of the Green belt has been considered in the LDP. They therefore can be considered up to date and appropriate.
- 6.04 LDP Policy 8 states that *"applications for development in the Green belt will be determined in line with national planning guidance and other relevant policies with the development plan"*. The policy set out above for national policies in respect to Green Belt are therefore applicable. Reflecting the conclusion set out in Section 5 (above) on Green Belt the Proposal does accord with the Development Plan.
- 6.05 The following parts of this section of the Consultation Response consider other LDP policies relevant to the Proposal.
- 6.06 In respect to LDP Policy 15, climate change, the Applicant's claim (at PS 9.4.4) the Proposal could be considered to be "small scale renewable technologies", which are encouraged in the LDP Policy 15.3. However, the Applicant's remark in relation to LDP Policy 15 are misleading. Contrary to the claim, the Proposal could not be considered to be "small scale renewable technologies". The Proposal is neither small scale, nor is it a renewable technology. Generally, Policy 15 seeks to encourage 'energy efficiency'. Even the most efficient BESS have an efficiency of around 90%. That means that about 10% of the energy that would be imported and exported is wasted.
- 6.07 The Applicant's proposals in regard to landscaping and biodiversity are noted (PS 12.1). 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 in countryside and far from an urban settlement. The landscaping seeks to camouflage it. Whilst this is maturing, where any gaps arise and during construction the alien industrial structures will seriously detract from the current high quality natural open countryside.
- 6.08 LDP Policy 16 covers the Natural Environment and Landscape. Policy 16.2 emphasises how the natural environment and landscape is integral to delivering the vision of the LDP for the Borough. Consequently, proposals need to *"demonstrate how the use of natural resources has been minimised"*. in the Proposal's core use of lithium, steels and other materials in the development, the Applicant has not demonstrated fulfilment of this Policy. Whilst the Applicant's biodiversity proposal are noted these are only necessary because of the adverse effects of the Proposal.

- 6.09 The LDP has policies, 36, 37 and 38, 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 would affect the setting and surrounding of the historic settlement of Feckenham. The Proposal does not 'conserve and enhance' the area and these valued heritage assets.
- 6.10 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 requirement have been tightened recently, including the need for immediate access to water for fire suppression. As the Applicant's fire safety report concludes *"the design and technical specification (of the fire safety system) has not been concluded"*. Consequently, the Proposal fire safety system does not comply with the guidance. The consequence of this fire risk is not only a fire itself, but the potential for chemical contaminants to sterilise the ground and seep into water courses.
- 6.11 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.
- 6.12 The Applicant states they identified the Site via a 'selection process' (PS 4.0). They state *"the proposal must be located close to an agreed pint of connection"* and suggest reasonable proximity to these is required. This site selection process includes: *"adequate capacity on the electricity network"; "a viable proximity to a substation with available import/ export capacity"*. However, the Applicant provides no evidence at all to substantiate the process they claim they have carried out. Data from electricity network operators shows that are several hundred thousand substations and point of connection in the UK, with some 175,000 operated by the local Distribution Network Operator in the local area. Most of these points of connection are located in urban areas, where they would be well suited to an industrialising development such as

BESS. 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.

- 6.13 The Applicant fails to explain why this Site, rather than all the others across the country or sites within 'employment land' areas, within a 'viable distance' of a point of connection, has been selected. With due respect to the Applicant, it appears that their 'site selection process' has been reverse engineered to give a pre-determined justification to this Site. The Applicant fails to provide evidence that this Site is the only site, or one of a very few sites, available where the Proposal has to be located. Rather to the contrary, the evidence shows that there are many locations where developments similar to this Proposal could be located. The Applicant seeks to suggest that the Policies which apply to this Site should be discounted because of a pressing need for the Proposal that, apparently, can only be built in this locale. They fail to provide the evidence to substantiate their claims.
- 6.14 It is known that there are several other BESS proposals 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. There is no live consent for BESS within the area around the substation. Whilst each case needs to be determined on its own merits, it is likely that any planning permission for BESS in the vicinity of Feckenham would be seen as 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.

7 WEIGHING THE PLANNING BALANCE FOR THE PROPOSAL

- 7.01 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 8 Green Belt and National Framework policy on Green belt; (c) That the Proposal does not comply with LDP Policy 2 on the settlement hierarchy; (e) That 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.
- 7.02 Therefore, the Proposal does not accord with the Development Plan.
- 7.03 In respect to the need for the development claimed by the Applicant or any other need for the development that need has been met. The Applicant's claims 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 'very special circumstances' in relation to Green Belt Policy or other 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.

- 7.04 When all of the Planning merits and effects of the Proposal are weighed in the planning balance the Proposal should be refused planning permission.

8 CONCLUSION

- 8.01 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. The Site is located in the Green Belt and policy on this is overriding policy criteria. The Proposal does not warrant 'very special circumstances' and there is no justification in respect to demonstrable need for this type of development proposal.
- 8.02 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.
- 8.03 In conclusion, the Feckenham Parish Council responds to the Consultation by calling on the Borough Council to refuse planning permission for this Application (25/00888/FUL), by boom Developments Ltd, for 'battery energy storage system' with access and associated infrastructure at Wheaton Hill Farm, near Feckenham, Worcestershire.

CDF for FPC
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