

# BESS is back...here we go again!

On 12 September a new application by **Sunbury BESS Limited** (via its agent DWD Property and Planning) for its proposed Battery Energy Storage System on Green Belt land adjacent to the Charlton Lane Eco Park appeared on the Spelthorne Council planning list. Readers will recall that the original application for this unprecedented proposal was recommended by the Spelthorne Planning Officer for refusal prior to consideration by the Planning Committee meeting in June. In an admirably detailed and analytical Report, the Planning Officer considered the various arguments put forward by the applicant for there being 'Very Special Circumstances' as to why the scheme should be allowed to be built on Green Belt land in Sunbury. In rejecting these arguments there were three key reasons put forward for refusal, involving inappropriate development and substantial loss of openness within the Green Belt, significant harm to the character and appearance of this rural area, and insufficient evidence submitted related to potential harm upon the integrity of the M3 and the safety of its users. In the event, the application was withdrawn by the applicant shortly before the meeting took place, and we have been waiting since then to see what would happen next, given that we have had a significant change of government with its potential changes in approach to infrastructure projects.

On the face of it however the scheme that has now been re-submitted differs little from that which went before. The changes to the scheme appear relatively minor, comprising:

- Some re-alignment of the 96 battery containers and 48 associated transformers to give some more room for landscaping around the periphery.
- A revised landscaping scheme intended to provide (eventually) additional mature planting around the site in an attempt to hide the rows of containers.
- The addition of automatic shut-off valves between the BESS area sump and the swale. This is to prevent the many hundreds of thousands of litres of water that will potentially need to be used to quench any BESS fire event from transferring contamination into the water table. This of course assumes sufficient underground storage capacity being provided to do so, which is a difficult number to assess given the novel nature of the technology and its thermal runaway likelihood.
- The removal from the scheme of most of the cable route around the Queen Mary reservoir to the National Grid Sub-station near the Fordbridge roundabout. This is due to the fact that it would be under the public highway and thus considered separately on behalf of the network provider. It does however still include the section between the BESS site and Charlton Village, as that is on private land – apart from the section underneath the M3. Details of the tunnelling under the motorway have apparently been submitted by the applicant to National Highways, which may presumably now reconsider its concerns.
- The correction of several (but not all...) of the errors and anomalies that we pointed out in the original application documents.
- A lengthy additional section to the Very Special Circumstances document showing an apparent analysis of all the other potential BESS sites that lie within a 3km radius of the Fordbridge Grid Substation in an attempt to show why none of them are remotely viable compared to the Charlton Road site. What of course it does not answer is why this specific area needs a BESS at all.

Most aspects however have not changed:

- The stated capacity of the scheme is still 200MW output and 400MWh storage.
- It is still being touted as necessary for increasing the use of renewable energy, whereas of course it cannot differentiate between generation sources and is a useful money-making

process that 'hedges' MWh by buying electricity when it is plentiful/cheap and selling it when it is scarce/expensive.

- It is still egregiously referred to as 'temporary', in spite of its proposed lifespan of 40 years being effectively 'permanent' as far as most current local residents are concerned.
- It is still in many ways still an outline rather than full submission, as much of the detail of the installation and its operation is described as provisional or conceptual and subject to conditions to be defined later.
- The Framework and Outline Safety and Management Plan (FOSMP), written by consultants Ramboll, has not been updated from the previous submission and remains as such an outline plan '*In recognition of the conceptual development stage of the Sunbury BESS,...*' (para 1.2.4 of their Report). It still considers the impact of the majority of the identified risks of the installation as being in the '*catastrophic*' category.
- The Surrey Fire and Rescue Service might have been expected to have had rather a significant role to play in defining the safety of the proposal. However it commented on the first scheme thus: '*Whilst we were unable to access the proposed plans on the planning website, we have reviewed the Sunbury BESS Framework and Outline Safety Management Plan (FOSMP) which appear to demonstrate reasonable compliance with the criteria laid out in the National Fire Chiefs Council (NFCC) Guidance and the National Fire Prevention Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems; as such we make no objection at this stage and will await (where necessary) any statutory consultation(s) that may follow.*' and has already provided its consultee response to the re-submitted scheme in the form of a standard letter stating that '*The ... application (including any schedule) has been examined by a Fire Safety Inspecting Officer and it appears to demonstrate compliance with the Fire Safety Order in respect of means of warning and escape in case of fire.*'. Surely the SFRS has to be concerned about this unique industrial proposal beyond considering it as just another standard planning application?

In the meantime, all the local Residents' Associations have been individually canvassed by the Applicant with a view to having separate local consultation meetings. Collectively we have agreed that it would be better to have a single meeting at which all the RAs were represented by members of their committees, and this meeting is in the process of being set up. As LOSRA we will post a report on the outcome of that meeting once it has been set up.