BESS is back…an update:

The comments given below on planning application **24/01112/FUL, for the construction and operation of a Battery Energy Storage System ('BESS') on Green Belt land adjacent to the Charlton Lane Eco Park**, are from the Lower Sunbury Residents Association (LOSRA).

1. **The revised application is little changed in scope or detail from the previous application (24/00017/FUL) that was recommended for refusal at the SBC Planning Committee meeting in June 2024 but withdrawn shortly before the meeting. The minor alterations to the layout of the battery and transformer containers, to allow modest additions to the landscaping arrangement, make no material difference to the reasons for refusal of the original scheme.**
2. **The proposal comprises 'inappropriate development' within Green Belt under paragraphs 152-156 of the National Planning Policy Framework (NPPF):**
    - The Applicant has therefore put forward a revised 'Very Special Circumstances Report' in order to argue that the application should nonetheless be approved. However:
3. **The 'very special circumstances', claimed under the following headings, do not justify such approval:**
    - *'The need for battery storage and its role in grid stability, decarbonisation, supporting renewable energy generation and meeting the challenge of climate change':*
        - There is no way that electricity on the grid can be differentiated in terms of the origin of its generation, be it from fossil, nuclear or renewable sources. There is little, if any, large-scale renewable energy generation in the area around Sunbury. The proposed BESS would presumably need to pay its way by taking in plentiful, cheap electricity and releasing it again when demand and price rises.
    - *'The requirement for the BESS in this location and the lack of alternative sites':*
        - The only rationale for proposing a BESS on the Charlton Lane site is that it is an available site of suitable size 'close' to a grid supply point, albeit one that is at the stated limited of viability in terms of connection length. This does not make it a 'requirement' but merely just one of many potential sites around the UK.
    - *'Support for the rural economy':*
        - This is simply implausible for an operationally unmanned industrial complex on suburban Green Belt on the border of Greater London with its major components, the 96 battery modules themselves, specified from a Chinese supplier. It is however acknowledged that the scheme could indeed provide a useful additional source of income for the landowner.
    - *'Wider environmental benefits including planned diversity net gain':*
        - The biodiversity analysis provided in spreadsheet form with the revised application shows a net loss of 35.32%. The planning requirement is for a net gain of 10%. No details are given for how the resulting 45.32% deficit would be made up, but they could be either on-site or off-site, with the latter potentially giving no local benefit at all.
    - *'The temporary and reversible nature of the proposal':*
        - It is claimed that the proposed development is 'temporary', since it will 'only' last for 40 years and then revert back to nature. That is not only both un-enforceable and unpredictable, but also of no advantage whatsoever to current local residents.
    - *'Community benefits':*
        - No specific benefits to the local community are mentioned, beyond reference to other sites having been provided with a £100,000 community fund managed by a local Council for community projects. It is hard to see how such a fund could justify or compensate for the local loss of Green Belt and the imposition of 40 years of BESS operations with its potential dangers.
4. **If it were to be built, the BESS complex would represent an unacceptable industrial visual intrusion and extensive health and safety risks:**
    - Although the Applicant has provided no drawings showing the actual appearance of the overall proposed BESS scheme, it is not difficult to imagine what 144 industrial containers laid out in rows across the site will look like; it would surely be an irredeemably ugly blot on the Green Belt landscape, even with a planting scheme that might eventually conceal some part of it.

- The land-locked site is also surrounded – by the M3, the Shepperton branch railway, Charlton Village, Ashford Common Water Treatment Works, Upper Halliford's Birch Grove area and the Charlton Lane EcoPark.
- It is stated that the site layout has been amended as a result of advice from the Fire Services and reference to the planning guidance from the National Fire Chiefs Council. This resulted in the battery modules being located further from the M3 motorway in order to avoid the impact of the smoke plume on vehicles in the event of a BESS fire. The site is also required to have 9 large water tanks containing a total of 225,000 litres, assessed as providing enough water to fight the fire for two hours. A battery fire is a chemical fire that provides its own oxygen; quenching it requires the provision of huge amounts of water to cool it down over many hours and sometime days.
- Depending on the wind direction at the time, the smoke plume from such a fire, which could contain a range of toxic gases, might not affect the M3 but rather Charlton Village, Upper Halliford, the Ecopark or, most worryingly, the Ashford Common Water Treatment Works. If it were to be raining at the time then presumably the toxic chemicals in the plume would then wash out into whatever lay beneath.
- In a similar vein, the large volumes of water needed to quench such a fire would inevitably pick up those chemicals, most notably hydrogen fluoride, and pass them into the proposed gravel containment layer designed to prevent the toxic water from passing into the water table. The total useable volume of the containment layer can be calculated, from the data given in the applicant's **Flood Risk Assessment** document, to be 420 cubic metres, or 420,000 litres. On the basis of the requisite storage volumes noted above, this would contain just 3h44m of firefighting water. Previous BESS fires have taken many tens of hours longer to fight than this; it is unclear from the provided documentation where the additional firefighting water would come from, or where the additional tainted water could be stored to avoid it getting into the water table.
- The '**Framework / Outline Safety Management Plan'**, written by consultants and re-submitted unaltered from the previous application, might have been expected to provide details of how these fire and other risks would be managed, but it is almost entirely conditional upon the receipt of further information from the Applicant. It would also appear, from their consultee responses to date, that neither the Health and Safety Executive nor the Surrey County Council Fire and Rescue Service are inclined to get involved with the level of fire hazard that this proposal involves. In the F/OSMP the Applicant claims that a 'Rochdale Envelope' approach is being taken for the project development, but has not provided details of the 'cautious worst-case scenario' being used to define the safety measures for the scheme, as recommended in **Planning Inspectorate NSIP Advice Note #9.** This is surely unacceptable.
- In various areas the application proposes that conditions could be imposed after the granting of planning permission. For such a large, novel, complex and hazardous full planning application such as this it is surely unacceptable to assume that a LA planning department includes the specialist technical skills to define such conditions.

For the reasons stated above, we submit that the application should again be refused.