

## Sunbury BESS application – a further update

This objection to the application is made on behalf of the Lower Sunbury Residents' Association (LOSRA):

While we await the applicant's submission of a further revised scheme, apparently linked to statutory consultee responses to the second application, it is important to take note of the recent response in California to the 16 January 2025 fire at the Moss Landing Power Plant in Monterey. There, a lithium battery fire in a 300MW BESS plant resulted in the destruction of most of the plant and the temporary evacuation of around 1,200 local residents. The local fire service decided that it did not have the means to fight the fire successfully and therefore left it to burn out, which took five days. Subsequent investigations have now shown extremely elevated levels of heavy metals in the soil and groundwater of the surrounding areas, directly attributable to the burning lithium batteries.

As a result of the fire, a local moratorium on BESS developments has been announced, and the State of California is proposing new legislation to restrict future schemes. Its draft Bill proposes significant restrictions on BESS developments, including:

- Prohibiting BESS facilities of 200MWh or greater within 3,200 feet of sensitive receptors
- Restricting development on environmentally sensitive sites
- Repealing 2022 permitting reforms that had expedited state approvals for these facilities under California's climate change initiatives

It is relevant to note that requiring a 3,200 feet (about 977 metres) clearance around a BESS installation in the UK would completely rule out the Charlton Lane site, since sensitive receptors such as housing and schools in Upper Halliford, Charlton Village and Sunbury, together with the Eco Park and significant parts of the Queen Mary Reservoir and Ashford Common Water Treatment Works, would all fall within such a zone.

It is to be hoped that understanding the impact of the Moss Landing fire might now convince the Surrey County Council Fire and Rescue Service to consider that this application, in whatever revised form it may yet take, is worthy of assessment beyond its current standard response to date, which is restricted to 'means of warning and escape in case of fire'. Moreover, a lithium battery thermal runaway event on this scale is likely to require the attention of not just the local F&RS but potentially the neighbouring services too.

Equally, the Moss Landing findings of extremely high levels of heavy metals in the soil and groundwater of the surrounding areas, directly attributable to the burning lithium batteries, is surely reason enough for the UK Health and Safety Executive to revise its currently stated view that (a) 'This application does not fall within the Consultation Distance Zones of either a Major Hazard Site, Major Accident Hazard Pipeline or Explosive Site.' and (b) is not a 'relevant building (that) is defined as (one that) contains two or more dwellings or educational accommodation (and) meets the height condition of 18m or more in height, or 7 or more storeys'. It is of course not multi-storey dwellings but self-evidently a major industrial installation, and – equally self-evidently – a 'major hazard site' in its own right!

It is worth concluding with a quote from Dustin Mulvaney, a professor of environmental studies at San Jose State University, who has studied the Moss Landing plant: "Battery energy storage systems are complex machines," Mulvaney says; "Complex systems have a lot of potential failures."