Field BESS Planning Application Notes

Document	Notes	Comments
Agricultural Land Classification Report	Document produced by Terra Analytical UK. The eastern part of the proposed development was not assessed as this will be used solely for the redistribution of soil from the western half. Stated that the land will still be used for arable production after the topsoil has been relocated. No soil analysis has been carried out on the eastern part of the site due to it not being used for development. The land required for the BESS has an assessment of grade 3A – which is high quality agricultural land.	 Comments given at the meeting on the 26/06/2025 that this wouldn't be the case. The land will take time to recover. This seems an omission No convincing reasons given as to why grade 3A land has to be used, apart from nearby infrastructure, i.e. existing pylons.
Alternative Site Assessment	Document has been produced by Lichfields – started to be a pre-eminent planning and application consultancy over the last 60 years in the UK. Section 1.4, on page 2, states that it is necessary to use grade 3a land (i. e good agricultural use) for a BESS. Why? Why not a brownfield site? Section 1.4 also states "am opportunity to store and export a considerable amount of renewable energy as a result of a specific point of connection to the electricity grid network".	 No reason given as to why a brownfield site can't be used? For example, why not purchase Tibenham airfield and site the BESS there? It would be closer to the future connection point. Field don't have a specific point of connection to the electricity grid network. The desired connection point will be the new sub station that will be built by National Grid as part of the future East Pye Solar solar-farm. This will not be operational until sometime in 2032 onwards? From discussions with East Pye personnel at the East Pye consultation on the 02/07/2025, East Pye will be leading the project management, with National grid acting as their sub-contractor. During discussions it became apparent that Field haven't approached East Pye as to any future connection. At this point in time, Field doesn't have a viable connection point.

Document	Notes	Comments
		There is also a major dependency in that Field need to align themselves to the East Pye project timescales.
	Section 2.1 states “South Norfolk Council.” It should be “South Norfolk District Council.”	Correct names should be used where possible.
	Section 2.11 states “…an electricity pylon is located near to the north western corner of the field…” and “…the line of electricity pylons continues into the neighbouring field south west of Market Lane, meaning infrastructure development is part of the existing landscape character of the area..”	This does seem to be stretching things as to how landscape is classified.
	Section 3.0 – Proposed Development The fire water storage tank is stated as being 8m x 8m x 7m. If a circular tank is used, this will hold 352,340 litres of water. If a square tank is used, this will hold 448,000 litres of water.	If a fire breaks out in a battery unit, approximately 200,000 litres of water will be required to cool it. The proposed size of tank is insufficient if two fires break out at the same time.
	Dimensions of transformers given as 9 m long, 10 m wide and 7 m high. How are they to be transported?	Presumably this is the size of the overall transformer and connectivity equipment? Not the size of the actual transformers? This doesn’t correlate to size information given as to the movement of abnormal loads, i.e. the movement of the transformers that weigh 116 tons.
	Section 3.2 states “…the proposed BESS area includes provision for possible public access around the northern, eastern and southern periphery of the BESS area…”	There is a public right of way along the western side of the BESS area, known as Great Moulton footpath 5. This is shown on the Definitive Map, TM19SE. This joins with Great Moulton footpath 6, at the junction of the stabling. The stabling is accessed by FP5 from Carr Lane. Access to the stabling / public right of way, must be catered for.
	Section 3.6 states “…Field has secured a grid connection agreement from NESO to connect to the national grid via a	

Document	Notes	Comments
	new substation. The location of the National Grid substation is subject to ongoing discussions between National Grid and landowners but is likely to be in the Great Moulton area. (Section 5.0 provides more details)…" Section 3.7 states "…the proposed BESS will connect to the substation via an underground cable, which will be applied for via a separate application in the future…"	Field may have secured a future grid connection from NESO, but NESO isn't National Grid and East Pye. Field must co-ordinate their grid connection with East Pye. Again, Field must co-ordinate the route with East Pye. At present, it must be assumed Field doesn't have a viable route for connection to the new substation. In order to connect via an underground cable, Field will have to negotiate with the farmers whose land they need to cross; some may not co-operate.
	Section 3.8 states "…with the soil only being deposited on the areas that are currently, and will continue to be, farmed for agricultural crops…"	This is counter to the view expressed at the Parish Council consultation meeting held on the 26/06/2025.
	Section 5 (sections 5.2 to sections 5.16) defines all of the various constraints in defining an area of search with regard to an alternative site in consideration of a grid connection. They also state that Field has a grid connection agreement to connect to the electricity network via the existing 400kV overhead line that runs north to south between Norwich Main and Bramford substations. They also state that it is assumed that the new East Pye National Grid substation will the point of connection.	An assumption of using the proposed East Pye / National Grid substation is not the same thing as stating Field will be. Field has an agreement with NESO, but may not have an agreement with National Grid, who will be building the new substation to East Pye specifications. At present there is a working assumption that Field has no definite connection to the National Grid. The Norwich Main substation is located just to the south of Norwich, close to the A47 southern ring road, opposite the entrance to Dunstan Hall. Bramford substation is located near to the west of Ipswich. Potentially, Field could site a BESS anywhere that would allow connection between Norwich and Ipswich; a BESS doesn't have to be sited at Great Moulton. No other alternative assessment sites have been considered, or even initial sites. No arguments have been put forward by Field as to why the BESS has to be sited at Great Moulton; no consideration of other potential sites along the route of the pylons from Norwich Main to Bramford given.

Document	Notes	Comments
	Section 5.6 states "…BESS infrastructure requires proximity to a substation to facilitate connection to the electricity network, allowing for the transfer of stored electricity between the BESS and the network. However, securing a grid connection in the UK is currently very challenging due to the highly constrained national grid network. A BESS development requires both an import and export connection to operate effectively on the grid network. Section 8 of the document presents several arguments as to why land close to Aslacton isn't suitable as an alternative site for a BESS.	Siting the Field BESS close to the Norwich Main substation may be the best solution with respect to connectivity? The alternative site has been selected solely from the view that the connectivity will be taking place at the East Pye solar-farm, hence only sites within a 3km radius from the new substation, were considered. The recently announced Tasway solar project will also have a BESS and a new substation, why can't Field site a BESS closer to the Tasway substation?
Arboricultural Impact Assessment	Document produced by Oakfield Arboricultural Services Section 3.1.3 states "…the proposal does not require any trees to be removed to accommodate the layout as such the arboricultural impact is of low concern. Section 3.5 states "…Tree protection measures would be required during 5the construction phase and it is anticipated that fencing will be the only measure required.	If the Field BESS does go ahead, need to have a clause stating that all present trees are to be preserved? If planning permission granted, then clauses stated as to protection measures required? (Note: the detailed diagrams in the appendix illustrate how large the 400Kv transformers are, and hence what potential size of abnormal load vehicle will be required to transport them to the site. Sizes of potential vehicles to be used are given in the Environmental Statement – Appendix E3 – Abnormal Indivisible Load Access Summary)
Archaeological Desk Based Assessment	Document produced by Sweco	

Document	Notes	Comments
	The executive summary states "…There is no indication however that any archaeological remains within the site would be of such significance to warrant preservation within the site. It is recommended that further work takes place before construction…" Section 1.1 states "…this archaeological desk-based assessment has been prepared by Sweco UK Limited for Field Long Stratton Limited…" Section 6.1.1 states "…Further archaeological work will be required to establish the nature, extent and date of the anomalies identified in the geophysical survey and to determine the presence, or absence of any additional findspots given the success of similar programmes in the past…"	If planning permission is granted, then a clause confirming further archaeological investigation is carried out prior to construction? Why not use an archaeologist from a suitable establishment? If planning permission is granted, then a clause added that this work must be carried out prior to construction?
Auxiliary transformer plan and elevations	Document is a pdf drawing showing the various elevations of the auxiliary transformers	From the sizes shown, it appears they are weighty items. The plan shows they need 12 inches of solid concrete to stand on.
Battery Container Plan and Elevations	Document is a pdf drawing showing the various elevations of a battery unit.	The diagram confirms the dimensions of the battery units at 6m long, 2.44m wide and 3m high. It shows the battery units sitting on 12 inches of concrete or a 12 inch high skid block?
Biodiversity Net Gain report	Document produced by Sweco It states the the construction will commence in 2028 and have a 30-month construction timespan. (Section 1.3) Section 2.1 describes the current legislation relating to biodiversity. It states "…A two-year transition period for this requirement is included in the Act. With provision for secondary legislation to set a date for the requirement to come into force. It is likely this will be late 2023 or later…"	This doesn't correlate with the Environment Statement – Chapter C – which states construction starting in June 2029. This document was written 28th May 2025. Surely it is known by now what the date is for all planning permissions in England must be granted subject to a new general pre-commencement condition.

Document	Notes	Comments
	Section 4.1 covering strategic significance, states "…This was based on searches within the South Norfolk and Broadland District local plan add reference which did not include the site within a local strategy…" Section 6 – Conclusions and recommendations, states "…Trading standards have been met…"	And the reference is what? What trading standards?
Block Site Layout Plan	Diagram showing the main components of the BESS units as laid out on site. A section of Carr Lane is shown as being in the planning boundary. The plan shows two large attenuation basins (for holding water).	Why does the planning application constantly show part of Carr Lane within the planning boundary? Carr Lane is a public roadway, maintained by Norfolk County Council. Will require direction from the Norfolk County Councillor. The attenuation basins do not necessarily appear on other drawings of the future site. Why not? Or are the attenuation basins simply areas of wetland to control the outward flow of water during heavy rain?
BNG Metric	This is an Excel spreadsheet used to calculate the Statutory Biodiversity Metric. It contains various tabs for inputting data, and producing an overall result.	
CIL Additional Info Form	This is a standard CIL calculation form.	
Contextual Elevations, diagrams 1 to 9	A set of nine contextual elevation diagrams showing various elevations at different points (slices) through the site, either on a WNW or NEN basis.	The diagrams show the height of some of the equipment. The transformers required to connect to the 400Kv line will be 8.23m (27 feet) tall. Some on the connecting infrastructure will be just over 9m tall. This will be easily visible from Great Moulton and Wacton.

Document	Notes	Comments
		The tallest connection pylon will be 12.15m tall. (just under 40 feet tall)
Covering Letter	Document is a copy of the covering letter that was attached to the planning application. The letter states "…This application seeks a temporary planning application for…" It also states "…the application demonstrates that the proposed development will not have a permanent material adverse impact on the surrounding landscape character and on views to and from the site..." Also stated is "…The Environment Statement and other technical assessments accompanying the application also demonstrate that there will be no significant adverse impacts on the local amenity, biodiversity, trees and other natural features, heritage, transport, noise, air quality, flood risk or on ground conditions…"	Application submitted by Lichfields, on behalf of Field. Why apply for a temporary planning application? So, installing 40 feet high pylons won't have an adverse impact? They will be easily visible and will jar with the existing landscape. There will be considerable impacts on the following: Transport, Flood risk, Local amenity, Noise
Ecological Impact Assessment	Document produced by Sweco Redactions occur in the document on pages 12, 35, 37, 39, 40, 44 and 45.	What is the reason for applying levels of secrecy to information concerning the local wildlife? The redacted sections occur in sections concerning great crested newt, bat roosting, ecological importance and potential effects on bats, and commuting and foraging bats. Is the information concerning bats enough to potentially stop the application in its tracks, in a similar fashion for the Norwich Western bypass?
Environmental Statement – Appendix A1 – site location plan	Large scale pdf drawing showing the outline of the proposed site.	Note: footpaths are not shown on the drawing. The site outline continues to include part of Carr Lane.

Document	Notes	Comments
Environmental Statement – Appendix A2 – developer sign-off sheet	The document is actually listed as Appendix A2 – Developer Statement of Competency. Document is a sign-off sheet stating that the Environmental Statement has been prepared by persons with sufficient competency.	With some of the documents being prepared by different companies / consultants, the question of overall competency appears to take a knock due to conflicting information arising. For example, in the area of transport. The site entry and exit appear to have been designed for 5 axle articulated vehicles, but larger vehicles needed for abnormal loads, don't appear to have been considered.
Environmental Statement – Appendix B1 – Request for an EIA Screening Opinion	The document is effectively a long letter to the Head of Planning, South Norfolk District Council, stating "…On behalf of our client, Field, we request that the Council provides a formal screening opinion to confirm the requirement for an Environmental Impact Assessment ('EIA'), in respect of the proposed battery energy storage system ('BESS') development at land north of Carr Lane, Great Moulton…" On Page 2 it is stated "…In summary we consider the proposed development will not give rise to a need for EIA. We outline below the analysis undertaken to reach this conclusion…"	This document is stating why an environmental impact assessment doesn't need to be produced. However South Norfolk District Council has already asked for a full EIA. This was considered under a separate earlier planning application, 2025/0872. The decision for an EIA was dated Thursday 1st May 2025
Environmental Statement – Appendix B2 – South Norfolk Council EIA Screening Opinion	This document is a letter from the principal planning officer of South Norfolk District Council (Richard Smith), setting out the need for an EIA to be carried out.	No comments
Environmental Statement – Appendix B3 – Air Quality Technical Note	The document has been produced by Sweco. Figure 1 on page 1 shows an outline of the proposed development site.	The outline differs from that in other related documents. Other outlines include part of Carr Lane, proceeding towards the Great Moulton and Aslacton Coronation Hall. This outline doesn't. There is inconsistency between documents.

Document	Notes	Comments
	On page 2 it is stated "…it is unlikely that the project will release pollutants or any hazardous, toxic or noxious substances to the air. This is considered likely to result in no significant effect…" Figure 3 on page 17 shows the construction dust risk assessment buffer areas. Page 19 has a consideration of traffic data and screening, and states the view of the transport consultant used in the determination.	The project to build the BESS is unlikely to have any detrimental effect on air quality. Any impact on air quality would arise in the unfortunate instance of a battery fire. The 250m zone just covers the Great Moulton and Aslaction Coronation Hall. The hall is used by many different groups, and there is an outside garden area. Construction dust has the potential to impact some activities, especially outside events. Necessary for Norfolk County Council Highways department to confirm these views / statements.
Environmental Statement – Appendix B4 – Construction traffic noise assessment	The document has been produced by WSP, based on information supplied to it by Sweco. Figure 1 on page 1 shows the proposed route for the construction traffic. Table 4 on page 4 shows the predicted changes in noise levels due to the BESS construction traffic.	The proposed route indicates that construction traffic will be coming down the A140 from the north, presumably this will be easier once the Long Stratton bypass is completed in late 2025. Presumably it will be the responsibility of Norfolk County Council Highways to confirm these figures?
Environmental Statement – Appendix C1 – Scheme plans	This document is simply a front cover, stating plans are bound separately.	
Environmental Statement – Appendix D2 – Detailed Outcomes of LVIA – Part 1	This document comprises tables describing the landscape visual impact assessment of the BESS construction, operation and decommissioning. Table 2, Visual Effects, lists the impact on local residents in Great Moulton and Wacton whose properties will back onto, or will view the BESS. The majority of impacts are listed as not	From comments received from Wacton and Great Moulton residents at parish council meetings, and at consultation events, ratings of not significant don't seem to align with the depth of feelings exhibited.

Document	Notes	Comments
	significant. Significant impact is listed for Wacton residents during construction. The table states "…new planting will help to soften the views over time…"	Perhaps it would be politic for Field to carry out a detailed communication strategy, in order to fully assess the local residents views? New planting will take several years to fully develop. How long a period does the word "time", refer to?
	The section on transport routes states "…both Carr Lane and Market Lane will be lined with a roadside hedge and oak trees.	With reference to the BBC Countryfile website, oak trees are slow growing and take 30 – 40 years to reach maturity, and to produce their own acorns. It appears that just when the trees have matured, they may be cut down when the site is decommissioned after 40 years.
	It's also stated that the site will be sited behind "a large-scale grassy bund (of c. 6m height)…" The effects are listed as not significant.	A grassy bank 6m high (19.7 feet high) will certainly be visible to road users, however it won't screen some of the transformer components, which are 40 feet high. Presumably an earth bank 19.7 feet high will require some form of strengthening to stop it from potential collapse in periods of heavy rain? (Although climate change may make the region drier overall, weather events could become more extreme, such as heavy rain.) Presently, Market Land and Carr Lane have views from both sides of the roadway, over open fields. Having one side shielded behind a 19.7 high grass bank is more than "not significant"?
Environmental Statement – Appendix D2 – Detailed Outcomes of LVIA – Part 2	This document shows the areas of higher potential visibility at 1, 2 and 3km radius from the proposed site. There are also various wide-angle photographs showing the current viewpoint from different locations.	The photographs show the wide-open rural nature of the current site and what the countryside at the various viewpoints, actually is. On the picture showing the junction of Frosts Lane and Carr Lane, there is a tree on the left-hand side of the photograph (first tree as progressing down Carr Lane). The grassy bund proposed in Part 1, will be above the height of the tree (assuming the tree is approximately 15 feet high).
Environmental Statement – Appendix D2 – Detailed Outcomes of LVIA – part 3	This document contains further wide-angle photographs of current viewpoints from different locations as listed on the map in Part 2.	

Document	Notes	Comments
Environmental Statement – Appendix D3 – Landscape Strategy Plan	This document shows a plan of the proposed landscape of the BESS site, listing the scrub mix species, the woodland species, and mixed native hedgerow species. It also lists the wildflowers and grasses for standard purpose meadow mixture and the wildflowers and grasses for wetlands.	The diagram shows that approximately 100m of Carr Lane (from the junction of the track that leads to the stud buildings, towards the Great Moulton and Aslacton Coronation Hall), is considered to be part of the site boundary. Why is a public roadway part of the site?
Environmental Statement – Appendix E1 – Transport Statement	Document has been produced by Sweco. On page 2, it states "…Further northeast from the site there is a small rural residential area along Hall Lane. Travelling southwest from the site there is another small rural residential area located in Great Moulton. Looking further afield, the village of Aslacton is located to the northwest of the site…"	Great Moulton is now of a size that it can't be viewed as a small rural residential location. The Great Moulton parish includes 543 properties, with another 12 properties being constructed. The small rural residential area along Hall Lane, is the outskirts of Wacton. The document needs to have a definition of what small, medium and large means I terms of numbers of properties.
Environmental Statement – Appendix E2 – Construction Traffic Management Plan	Document has been produced by Sweco Figure 1.1 on page 2 shows the site outline. Section 2 outlines the policy context and what policies apply with respect to construction traffic and abnormal loads. As regards the Norfolk Abnormal Loads policy (2025), it states "…if a route is an undesignated route or a minor road that is not frequently used, it is the responsibility of the haulier to ensure this route is suitable for the vehicle and the load…" Section 3.2.4 states "…Flowerpot Lane is subject to a 30mph speed limit…"	The site outline is different from other site outlines used in other documents. This is the third variant on what the site outline is. A common, consistent site outline needs to be used across all documents. The proposed construction site is only accessible by minor roads. Norfolk County Council Highways will have to confirm if the roads provide a suitable access route. This is not strictly true. From its junction with the current A140, until the junction with St. Leger road, a 20mph speed limit operates.

Document	Notes	Comments
	Section 3 has no consideration of the changes that the Long Stratton bypass will bring to construction traffic routing.	The Long Stratton bypass will be opened in late 2025, and will present different access routes to the junction of Flowerpot Lane with the current A140. Approach will be possible from the north or the south. The Construction Traffic Management plan will need to be revised / edited in line with the changes.
	The diagram in figure 4.1 is not consistent with figure 1.1	Consistency needs to be brought to the site outline. Document reviewers should not be in a position of trying to decide what the true site boundary is.
	Section 4.1.5 states "…In the unlikely event that the Market Lane access is not available, the secondary access point on Carr Lane can be used.	Carr Lane is narrower than Market Lane, and the swept path analysis later in the document shows the different access point catering for different sizes on construction traffic. Norfolk County Council Highways will need to confirm the suitability of Carr Lane for large articulated lorries / vehicles.
	Section 4.2 – Vehicle Routing – states "…the route between the site and the A140 via Market Lane / Hall Lane / Stratton Road / Flowerpot Lane, as shown in figure 4.2, has been identified as the optimum route for construction vehicles…"	The confirmation of the optimum route and the viability of that route will need to be confirmed by Norfolk County Council Highways department. (It is the author's view that the route may present some challenges)
	Section 4.2.6 states "…the site is remote with a lack of continuous footpaths, making pedestrian access to the site unviable…"	If the document author lived in the area, they would be appreciative that on sunny days local people from the village do indeed walk the roads and footpaths bordering the site, often exercising their dogs.
	Section 5 lists the types of construction vehicles needing access to the site, and the frequency and types of journeys.	The desired route may be challenging for articulated vehicles up to 16.5m in length. This requires confirmation from Norfolk County Council Highways.
	Appendix B shows that the swept path analysis for entry / exit on the Market Lane access is based on a 6 axle articulated lorry, 16.5m long, 2.55m wide and 3.68m high.	Norfolk County Council Highways will need to confirm if this size of vehicle can successfully navigate the construction route.

Document	Notes	Comments
Environmental Statement – Appendix E3 – Abnormal Indivisible Load Access Summary	The document has been produced by Wynns. The document states that only a desktop route assessment has been carried out to date. Two routes from either Lowestoft or Ipswich ports have been identified. On page 2, it is stated "…from desktop study, routes other than via Flowerpot Lane from A140, are deemed unsuitable…" The document states that swept path analysis has shown four limitations to access, namely "…> left turn from A140 to Flowerpot Lane, > left turn from Flowerpot Lane to Stratton Road, > right hand turn from Hall Lane to Market Lane, > right hand turn from Market Lane to Carr Lane. The maps shown in Appendix 1 don't take account of the changes to the A140 around Long Stratton. Indicative measurements and types of vehicles used to transport 116ton transformers are shown in Appendix 3	 Presumably the final abnormal indivisible load route will have to be finalised with all interested parties, such as Police, Norfolk County Council, etc. Both routes don't take account of the changes caused by the Long Stratton bypass, which opens in late 2025. Norfolk County Council, Police, etc, will need to confirm the suitability of the route for abnormal indivisible loads movement. Maps will need to be updated. Norfolk County Council Highways, Police, etc, will need to confirm if the desired access route is suitable for types of vehicles shown. (It is this authors' view that the indicative vehicles shown in Appendix 3, are too large for the proposed road route)
Environmental Statement – Appendix F1 – Historic Environments Settings Assessment	This document has been produced by Sweco. Section 2.3.1 states "…to provide sufficient context for the assessment, a 1km radial study area has been established around the site…"	 The document recognises that there are many Grade 1, II* and II category listed buildings within the 1km radial study area, but discounts the vast majority of them, only considering

Document	Notes	Comments
	Section 2.3.3 states a site visit occurred on the 28th March 2025.	The front page of the document states the document was produced on 2024-04-19. It appears the document was written approximately one year before the site visit.
	Section 2.5 – Consultation – states "…[add in a section here for any consultation undertaken with LPA etc. CiFA guidelines state this should happen on every project but need client permission]…"	This wording indicates that the document is unfinished. It shows that no consultation has been undertaken with the Local Planning Authority. (It's also noted that various page references need to be updated throughout the document. This is sloppy editing and should have been rectified before document issue.)
	Page 7 shows figure 4 – a photograph taken from the grade I listed church of St. Micheal, Aslacton.	It is unclear as to why this setting was used as it is outside the 1km radial study area. The study has been carried out from the view of what the proposed BESS site currently looks like, i.e. a gently rising field used to grow arable crops. It will be greatly different if the proposed BESS construction goes ahead, with some of the transformer elements being up to 40 feet high, plus a 20 feet high grassy bank constructed around the site that borders Market Lane and Carr Lane.
	Section 4 – Conclusions and Recommendations – states "…the assessment has identified the proposed development will result in a change to setting to the grade I listed church of All Saints through the introduction of a noticeable and novel modern built form…"	It is this author's view that the assessment has not properly assessed the impact on the various heritage assets AFTER the proposed development has been built. There will be new additions to the visible skyline.
Environmental Statement – Appendix F2 – Historic Environment Consultation Emails	Document was produced by Sweco The document comprises copies of two emails, one sent to South Norfolk and Broadland council, and the other to Historic England, both dated 14/05/2025. The emails state copies of the screening report were included.	 No reply emails have been included. The emails sent to both parties follow the same format.

Document	Notes	Comments
Environmental Statement – Appendix F3 – Heritage Figures	Document has been produced by Sweco The document comprises a map showing the heritage assets considered by Sweco in Appendix F1.	The map doesn't show the grade I Aslacton church. It also doesn't show all the other grade I, II* and II heritage assets / buildings that fall within the 1Km radial study area.
Environmental Statement – Appendix G1 – Map of sites considered in Cumulative Assessment	Document has been produced by Sweco. The document is a map showing the vicinity of the proposed BESS development alongside planning applications, the Norwich to Tilbury pylons scoping report corridor, and the East Pye solar scoping boundary.	
Environmental Statement – Chapter A – Introduction and Background	Document has been produced by Lichfields. Section a2.4 states "…Field is committed to developing projects that are safe, environmentally sustainable and have minimal impacts on local communities; achieved through careful site design and stakeholder engagement…" Section A3-9 states "…significant weight should be afforded the ability of the Proposed Development to contribute in meeting national and local renewable low carbon energy needs…" Section A3.10 states "…the technical assessment accompanying the application also demonstrate that there will be no significant adverse impacts on local amenity, biodiversity, trees and other natural features, heritage, air quality, noise, flood risk or on ground conditions…"	From the stakeholder engagement experienced with respect to requests for information and meetings to date, it appears Field is falling short of its aims. Various requests to talk with Field were met with rebuttals. At times Field demonstrated a contempt for full and open stakeholder engagement. Field's business model for the prosed BESS is to buy surplus energy from the grid, and then sell it back to the grid when demand has pushed the price up. It is a speculative commercial operation. The proposed East Pye Solar farm will have its own BESS, presumably sized to store its local excess energy production needs. This view doesn't correspond to those expressed by local parish council members, at the meeting with Field held on the 24th June 2025, at Great Moulton and Aslacton Coronation Hall. Due to the area of the site that would be under concrete, if there was a wet winter there would be significant rain run-off, resulting in flooding.

Document	Notes	Comments
	Section A3.14 states "…Overall, the requirements of the Statutory Development Plan, and the overarching aims and objectives of the National Planning Policy Guidance and other material national and local guidance have been met – the proposed development being appropriate at this location and bringing with it considerable sustainability benefits…"	From arguments expressed by the applicant to date, it is unclear if the proposed development is appropriate at this location. For example, input from relevant bodies such as Norfolk County Council and the Police as regards abnormal indivisible load access, is required.
Environmental Statement – Chapter B – Scope and Methodology	Document produced by Lichfields Sections B2 and B3 cover why an EIA was required. Section b3.10 states "…this EIS therefore includes consideration in the likelihood of significant effect in respect of Landscape and Visual (see Chapter D), Transport and Highways (see Chapter E), Built Heritage (see Chapter F) and, Cumulative Effects (see Chapter G). Within section 3, consideration is also given to air quality, and ameliorations that can be used to limit air pollution. Section 3.14 states "…Avoid the use of diesel or petrol powered generators, and use mains electricity or battery powered equipment…" It also states "…ensure an adequate water supply on site for the effecting dust / particulate matter suppression / mitigation…" Section B5.7 states "…the proposed development requires the delivery of a new National Grid substation and associated cable connection route to connect it to the Site. Both locations are yet to be confirmed and limited details are available regarding these proposals. For the purposes of this ES, it is	 Possibly the need can be expressed in simpler, plainer language. Possible limitation of scope. The site is currently an open field. There is no provision of mains electricity. Field will need an electricity supplier to install an electricity supply. Field will need to negotiate with Anglian Water in order to supply water as there is currently no water on site. Any water (rainfall) is absorbed by the soil as it's an open field. Eventually it runs off into the ditches. Presumably this is making reference to the new substation that will be built by National Grid for East Pye Solar. The worrying aspect of the statements is that Field has no recognition of the dependency on the East Pye timescales / project. The aim for the cable connection to follow a direct route is laudable, BUT, it will require negotiations with different landowners.

Document	Notes	Comments
	assumed that the substation will be within 3km of the Site and the cable connection will follow a direct route…"	
Environmental Statement – Chapter C – Site and Development Description	The document was produced by Lichfields Section 3.2 states "…it is envisaged that construction will be brought forward over a 30-month period, from June 2029 until November 2031…" Section 3.7 states "…the deposition of soil from the BESS area to the Soil Relocation Area is anticipated to take circa 6 months (between months 3 to 8 of the overall construction programme…" Figure c3.2 shows the indicative construction compound site layout plan. Section 3.22 states "…Appendix E2 of this ES details anticipated HGV and LGV movements associated with deliveries for the proposed development. This includes total anticipated movement by construction month…" Connection to substation: this section states "prior to the proposed development becoming operational, connection will be required to a new National Grid 400k substation. Whilst consent for the substation has not yet been secured by a third party, it has been assumed that this will be up to 3km from the Site."	 Field must co-ordinate its project management with the East Pye Solar project (assuming that goes ahead). Construction is stated as commencing in June 2029. Month 3 will be August, and month 8 will be January. The majority of soil relocation will take place over the autumn and winter period. If there is a wet autumn or winter, there is the potential for a severe amount of mud being spread over Market Lane. There is continuing variance as to what Field is stating is the site boundary. In this layout plan, the site boundary isn't covering a section of Carr Lane, instead it is claiming a part of the field that is next to Carr Lane, as progressing towards Aslacton. This is further evidence that Field has no clear idea of the exact site boundary. Appendix E2 **DOES NOT** show total anticipated vehicle movements by construction month. It lists bullet points stating information such as "general deliveries – 1320 deliveries over a 30-month period The document doesn't state what mitigations will need to be employed if consent to connect to the new substation doesn't occur. If the assumption is the Field will use the new National Grid substation as proposed by the East Pye Solar project, Field will have to negotiate with National Grid as to a connection date. This may impact on Field's timescales.

Document	Notes	Comments
	"the route for necessary connection is not currently known, but for the purposes of assessment it is assumed that the construction will proceed using open-cut trench and cover methodologies." Section 4.18 states "…During normal operations, the BESS will be operated entirely remotely. It will only be necessary for a maintenance engineer to visit the site during routine maintenance visits (estimated at two to three vehicle movements per week), or in the rare event emergency maintenance is required…"	Given the uncertainty of the positioning of the new substation as proposed by the East Pye Solar project, it is impossible to define an exact route. At least two roads (Market Lane and Frith Way) will need to be traversed. If open-cut trench and cover is used, this will cause major traffic disruption. Other methods will have to be used. No definition is given as to what "emergency maintenance" covers. There is also no statement on what happens should a power cut occur (which occurs fairly regularly in Great Moulton); is there emergency power generation on site?
Environmental Statement – Chapter D – Landscape and Visual Impacts		
Environmental Statement – Chapter E – Transport	This chapter contains so much contradiction and misleading information that it reads more like a script for an episode of 'Only Fools and Horses'. Assessment Methodology and Significance Criteria <u>Consultation: (Pg 6)</u> **'No formal consultation specifically related to transport has been undertaken to date'**	**The statement shows the total disregard for public safety in respect of one of the most impacting aspects of the whole project.**

Document	Notes	Comments
	Major Hazards and Accidents. E5.10 'It is unlikely that any major accidents or hazards will be generated or occur due to the proposed development. Road traffic accidents are possible involving vehicles during both the operational and construction phases however, the risk is low' E5.11 'A review of the existing accident data local to the site over a period of the last three years has not identified any accident patterns or clusters that may relate to unsafe junctions or road layouts'. E5.28 Hazardous/Large Loads E5.28 Acknowledges the delivery to the site of abnormal loads but fails to make any reference to the conveyance of large quantities of Lithium-ion batteries. A report by Frazer Nash consultancy included input and guidance from the	**These are small narrow local roads used almost exclusively by locals who are highly conversant with the local area and topography. With the exception of a very small number of HGV movements mainly associated with farm collections and deliveries, traffic is mainly made up of private cars in very low volume. Accidents are only reported to the Department of Transport under the STATS19 system if they are recorded by the police for any reason. By that methodology Road Traffic Accidents not involving personal injury do not appear in any accident statistics unless the reporting officer deems the incident major or a Road Traffic Offence has been committed or is suspected.** **How can any statement be made that introducing 51,169 extra vehicle movements on these roads many involving HGV's driven by individuals unfamiliar with the local area and in adverse conditions or the hours of darkness will only present a 'low risk'. This is totally unquantified 'finger in the air' guess work finding the question to a known answer.** **No mention is made that any consideration or risk assessment has been undertaken in respect of this part of the construction phase or adherence to this report of which FIELD themselves have been consultees. There is no indication that any measures will be put in place to safely convey Class 9 Hazardous materials on narrow public roads in close proximity to homes.**

Document	Notes	Comments
	DEPARTMENT FOR ENERGY AND NET ZERO, KENT FIRE & RESCUE SERVICE AND BY A STRANGE COINCIDENCE <u>FIELD</u>. This report states: *During transportation there is potential that BESS components will not have the same level of protection as they would once installed, for example from fire monitoring and suppression systems. It may be necessary to implement additional protections to mitigate this risk, such as disconnecting or separating components, limiting their charge level, or installing additional sensors that remain active during transport.* *It is noted that there may be the need to charge batteries to a certain state of charge (e.g. between 20-50%) to avoid excess discharge impacting battery health. This and balancing charge across batteries can help with early installation and commissioning. Standard IEC 62281 describes various cell tests, packaging and handling considerations to support safe transport.* ***UN Transport Regulations classifies lithium-based batteries as "Class 9 - miscellaneous dangerous substances and articles"** (with various sub-classifications based on the battery type and how it is packaged). **These regulations will apply to the transport of grid-scale BESS, and as such they should be treated as dangerous goods.** Additional guidance on moving potentially dangerous goods and equipment is provided by the HSE [18] and Department for Transport [19].*	

Document	Notes	Comments
	<u>During Construction</u> 5.14: During the construction stage a total of 51,169 vehicle movements will occur. *'2,628 will be involved in the movement of topsoil and will only be seen on Market Lane'.* E5.26 There will be an anticipated increase in traffic flows of 96 daily two-way vehicle movements during the construction phase. 'It is unlikely the increase will result in an increased number of collisions. Pedestrian & Cycle Amenity. E5.33: 'Considering the small increase in vehicle flows and the positive impact the footpath will provide [the permissive footpath along three sides of the site] it is anticipated the development will have a minor beneficial impact on pedestrian and cycle amenity during the operational phase'	**How will they get to and from Market Lane to carry out their duties, unless some form of teleportation is involved they must use other roads to get to the site.** **An alternative would be to have these vehicles stored on site for the duration of construction, surely in that case the site would then become and have to comply with the requirements of becoming an Operating Centre.** **If you increase traffic flow along narrow country lanes with high banking both sides, it is sheer folly to imply 'no increase will occur' especially as many journeys will occur in the winter months along unlit roads that will become icy and possibly snow covered.** **How can this be quantified?** **<u>Strangely this document commits more words looking into the transport arrangements for the decommissioning process in 2070 than it does in looking at what is relevant today.</u>**

Document	Notes	Comments
Environmental Statement – Chapter F –		
Statement of Community Involvement	Page 8 – stated that consultation took place with Ben Goldsborough, MP for South Norfolk, on 1st April 2025. Field continues to consult with Ben in answering constituents' questions, etc.	Only half the proposed site is in the South Norfolk constituency. The half that contains all the batteries, transformers, service buildings, water tank, etc, is in the Waveney Valley constituency. No mention made of consulting with Adrian Ramsey.