

**Planning Application Ref: 2025/1689**

**Proposal: Installation of Battery Energy Storage System Market Lane Great Moulton**

In reference to the above application Great Moulton Parish Council **OBJECTS** to the proposal based on the following:

**1. The proposal conflicts with the Local Plan/Development Plan Policies**

South Norfolk is covered by the South Norfolk Local Plan, which included policies on landscape protection, biodiversity and amenity.

Rejection of the proposal can be justified as per the following:

- The proposal is **not allocated or supported** in the Local Plan
- It conflicts **with countryside protection policies** and the Natural England Protected Hedgerow
- It fails to meet design or siting expectations of **Policy DM 4.5** (Landscape Character) and **DM 3.13** (Amenity, Noise, Light Pollution).

**2. Harm to Landscape Character and Visual Amenity**

If the BESS site would cause significant visual intrusion, especially in open countryside or near valued landscape (e.g. river valleys, Public Rights of Way, conservation areas), refusal is being based upon:

- **Adverse impact on rural character or scenic quality**
- **No Lighting Strategy has been provided** – this is an area where no light pollution currently exists. Light pollution in the countryside, caused by excessive artificial light, can disrupt natural ecosystems, impair stargazing and negatively impact wildlife and human health, blurring the distinction between urban and rural areas.
- Lack of appropriate screening/mitigation – no heights given to earth bounds
- **Failure to preserve the character of the landscaped as per NPPF Paragraphs 174 and 170 and local landscape policies:**

“Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land” (which the site resides on a Greenfield Class 3a 100% as per the Terra Agricultural Land Classification Report). This significant development on agricultural land must prioritise “areas of poorer quality land to those of a higher quality” as being preferred – **NPPF Paragraph 180 (formerly 174)**

- Historic England Heritage – Appendix 3 of the application **has completely missed over 26 Grade II Listed Buildings** within their search area
- Visual Impact Assessment *Environmental statement – Volume 3 – non-technical summary* = **Point 4.1.3 page 12 “Major Adverse (significant) visual impact of the BESS during Year 1 – Year 15. Major to Moderate Adverse impact after Year 15”**

### 3. Noise, Safety, Air Quality and Amenity concerns

- **Operational noise** (from cooling fans and inverters) impacting nearby residents breaching **Policy DM 3.13** – the installation will emit a constant hum, noise pollution at an unacceptable level. Moreover, the equipment will be working at a maximum noise level overnight. Constant hum noise is known to affect the mental health of certain groups of people including those on the autism spectrum, with ADHD and tinnitus
- **The Noise Impact Assessment has redacted sound level data/information on Points 4.3.4, 4.3.5, 4.3.6 and Table 4.1 on page 16**
- **On the NIA Points 4.3.6 MV Skid Units will produce approx. 82 dBA SWL of noise at source and will run near continuously without a distinct on-off condition (Point 4.6.3)**
- The Air Quality Technical Note (Appendix B3) does not take into consideration the air pollution hazards and risks if the BESS had a fire
- The EIA option document states that if a fire was to break out, particularly any of the battery components – “hazardous/noxious substances” would be released into the air and contaminants would enter the watercourse and land as containment is “challenging”
- Fire risks and concerns over **thermal runaway**, especially near the residential areas of Great Moulton and Wacton – particularly as the **fire mitigation measures** are unclear (fire tank capacity and firefighting water requirements calculation missing) therefore likely inadequate
- On the Battery Safety Management Plan there is an illustration of only one small fire suppression (Point 4.1 aerosol-based Figure 3 Page 8) system is included in the battery cabinet. There is no mention of any maintenance for this system or even the presence of a back-up system to this. Evidence from similar developments with lack of compliance with guidance (National Fire Chiefs Council position of BESS) strengthens this objection

Lithium is known to be one of the most unstable elements and is classified as a hazardous substance but on the application form the answer to the question “will hazardous substances be stored on site?” has been answered **NO**. Lithium-ion battery fires, often caused by “thermal runaway” are a serious concern due to their rapid spread

and difficulty in extinguishing, releasing both flammable and toxic gases. The recent fire at the BESS site in Thurrock lasted three days and took over 200 firefighters to dampen and extinguish and this highlighted the potential risks associated with large scale battery storage facilities and the need for stringent safety measures during the construction and operation of such sites. Several BESS installations across the UK have already been refused planning permission due to various concerns, primarily related to fire safety, environmental impact and inadequate planning.

#### **4. Flood Risk/Drainage Issues**

**Surface water management:** the site backs on to Flood Zone 2 & 3 with surface water flooding AEP probability of 1 in 30 (3.3%) = Medium Flood Risk Classification to the South of the site on Carr Lane. The application indicates that 55 acres will be levelled and concreted which will cause high levels of surface water, (which would normally be absorbed into the ground), and this will run off down Wash Lane, Fornsett and cause serious flooding to the vicinity and the properties within it.

There is a pollution risk if battery containers are breached during flooding or fire damage, no mitigation strategy has been submitted for this.

#### **5. Ecological Impact/Biodiversity Net Loss**

- Failure to demonstrate a completed **EIA or Ecology Report as only 4 of 6 surveys have been conducted and Pages 35, 39, 40, 44, 45 have redactions in the Sweco report**
- Potential damage to protected species or habitats (loss of protected hedgerows, impact on bats and great crested newts). Skylark (ground nesting birds) and Yellowhammer birds have been identified on the site via the Sweco Ecology Report 652155077-swe-xx-xx-t-j-001-c03

#### **6. Highways and Access Issues**

The access roads to the proposed site are narrow country lanes, near blind corners and are wholly unsuitable for HGV traffic:

No HGV tracking has been provided as evidence to show that both the Construction Traffic Management Plan and Emergency Response Plan/Access Arrangements would even be feasible.

- The proposal **compromises highway safety** and will cause **disruption during construction**. The turns to Carr Lane, Market Lane and Hall Lane would not accommodate large articulated/HGV vehicles without fully

blocking the road and to use these narrow rural roads would have insufficient passing space for other vehicles for a significant length of the routes

- Site Access 2 is very tight and likely inaccessible for HGV's and emergency services, HGV tracking required to include fire brigade vehicles

As per the Sweco Construction Management Plan Point 5.2.2 – “during the construction period total an average of 78 vehicle movements per day (including construction staff); this number is comprised of 52 LGV trips and 26 HGV trips”. This is a contradiction to the Environmental Statement Point E5-19 which refers to “the largest increase in absolute vehicle numbers is 96 over a 24-hour period” which would be two-way vehicle movements

This would have a significant impact on the residents, local highway network and a substantial ‘Fear and Intimidation Magnitude’ effect to the residents as per the IEMA EIA Guidance 2023 and the Environmental Statement percentages via Point E5-17 on the table showing baseline flows and absolute changes in flow. Mitigation measures have been stated but do not provide any detail on the delivery timetables/scheduling. A detailed CTMP needs to be submitted prior to approval with Highways to review.

### **Pertaining to Abnormal Indivisible Load Appendix E3**

No evidence of the dry-run assessment of the prescribed AIL required by Wynns Transport has been requested or carried out – only a desktop assessment has been done.

The route has not been assessed by UK Power Networks, Openreach, Gigaclear or County Broadband to assess overhead cabling along the route Long Stratton – Great Moulton.

Trees along the route will require limbs to be removed, many are on private land with possible TPO's but no mention in the planning application.

### **Environmental Statement Chapter E Transport**

No formal transport consultation has been undertaken.

Major accidents and hazards assessment is made without any quantified or relevant statistics.

It states that an additional 51,169 vehicle movements on narrow country roads is unlikely to increase the number of vehicle collisions despite vehicles and drivers alien to the environment will be utilised.

There is a total failure to acknowledge the Frazer Nash report (to which FIELD and the Government were consultees) on the dangers of transporting Class 9 Dangerous Goods (Lithium-ion BESS batteries) by road.

It declares that 2628 vehicle movements will only be seen on Market Lane without explaining how they will get to that location or how and where they will be stored during downtime.

## **7. Lack of Justification for Site Selection**

- The applicant has not demonstrated a detailed need for the specific location or assessed alternatives appropriately, particularly less sensitive sites (e.g. brownfield land, poorer quality agricultural land or even land under agreed development such as the Long Stratton bypass).
- Site 1 on the Alternative Site Assessment doc66936\_01 was considered as a good alternative with Grade 4 agricultural class in Flood Zone 1 which was even closer to the connecting substation therefore “merits further detailed assessment”. Site 1 was rejected due to the site being split by a tree line, Public Rights of Way, Grade II listings nearby and the visual impact (which the current proposed site also has a natural ecological hedgerow split, abutting footpaths, Grade II listings nearby and visual impact issues).

The application must be refused for poor site selection as only a 3km search radius was set without showing any alternative sites with pros and cons.