



Planning Application 23/03875/APP by Statera Energy (the Applicant)

Development of a battery energy storage system (BESS), connected directly to the national Grid with associated infrastructure including access, drainage and landscaping.

Rookery Farm, Granborough, Buckinghamshire, MK18 3NJ

Consultation Response by East Claydon Parish Council

Supplementary Documents

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Introduction

East Claydon Parish Council previously submitted a detailed critique of the documents submitted to support the original application for the proposed BESS (see 240205_23/03875/APP_East_Claydon_PC_Comments). In that document, we raised a number of concerns as regards the nature of the proposed development and the quality of the data offered in support of the application. These concerns, resulting from a detailed review of all of the documents, were summarised as set out in the paragraphs reproduced below. The evidence base for this summary was provided in the previous document.

The Applicant has submitted a series of revised documents to reflect changes in the proposed layout. This adopts a more densely packed series of battery storage units which has enabled one area (Field 3) to be retained for agricultural production. We welcome the opportunity afforded by the Planning Authority to review these additional documents against our original observations. At the end of each section of the summary, we have indicated the extent to which our views on the proposed development have been modified. More detailed comments are provided in the subsequent sections.

Site selection

- Although the proximity of a NG sub-station is convenient for the Applicant, the case for constructing an industrial development on this scale in a rural setting is not made.
- Other developments show that close proximity to a NG sub-station is not an absolute requirement.
- The development would be more appropriately located on a brownfield site with better access for emergency services and the opportunity to improve efficiencies through heat recovery systems.
- The case for energy storage on this scale (3,500 MWh) appears to be based purely on commercial arguments.
- The National Grid's stated requirements for BESS units has been exceeded already with planned and approved installations.
- Despite claims that the installation would be 'temporary' (40 years), the Applicant makes a number of statements suggesting that this would not be the case.
- There is little comment on plans for decommissioning, who would be responsible, the extent of restoration to agriculture, the associated GHG emissions, haul routes and recycling of materials.

We have no reason to alter our views on any of these points.

Reliability of data

- There are numerous inconsistencies and contradictory statements, (both qualitative and quantitative), across the documents in the Applicant's submission, casting doubt on the integrity of their conclusions.
- Over-reliance on desktop analyses results in failure to understand real world conditions.
- The cumulative impacts of other local infrastructure developments, planned or approved, have not been addressed adequately.
- Ecology and habitat surveys are incomplete.

We have no reason to alter our views on any of these points. Further discrepancies have appeared within and between documents. The proposal by National Grid to

construct a new sub-station have been largely ignored as it affects the BESS application in terms of cumulative impact, cable runs and timeframe for the development. The cumulative effects of other electrical infrastructure projects are largely ignored.

Noise and vibration

- The impact of noise during construction, operation and decommissioning has not been adequately assessed.

No reassessment of the implications of the revised plan have been submitted and so we have no reason to alter our views on this point.

Safety

- The risk of thermal runaway in a facility of this magnitude is high.
- We have serious concerns over safety, especially with regard to control of fire, thermal runaway and the release of toxic gases into the environment.
- We are concerned that insufficient thought has been given to the accessibility of the site and emergency services response times in the event of a major incident.
- The safety of cyclists, pedestrians and equestrians on rural roads has not been addressed.
- The safety of livestock and wildlife has not been considered.

We have no reason to alter our views on any of these points. As regards safety of the installation itself, the impact of the revised layout have not been assessed.

Planning policies

- We do not agree with the Applicant's assertion that the conditions of planning policies S1, BE1, BE3, NE1, NE2, NE4, Ne5, C3, C4, I1, and I4 have been met.
- The Applicant has acknowledged that the NPPF now includes additional wording as follows: *"The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development"*. However, this does not feature in the Applicant's analysis of the environmental impact of the proposals.

The retention of one field for agricultural production is a positive step. In all other respects we have no reason to alter our views on these points.

Ecology and habitats

- Surveys undertaken to date are incomplete and do not reflect the full picture for the range of species and habitats present, including rare and at-risk species.
- The Applicant's assessment of the area as a low-grade habitat directly contradicts that of the Berks, Bucks and Oxfordshire Wildlife Trust.
- No attempt has been made to survey the ecological characteristics of the site for the proposed temporary haul road; a gross oversight that needs to be addressed.

The additional ecology studies reported are, in our view, inadequate. We have no reason to alter our views on any of these points.

Flood risk and water quality

- The Applicant's reliance on desktop assessments of flood risk is flawed and seriously underestimates real-life issues associated with the site's hydrology.
- On-site assessment of flood risk has not been undertaken.

- Creation of large areas of impermeable surfaces would add further to flood risk, both on-site, and in neighbouring areas.
- The proposed temporary haul road involves land subject to regular flooding.
- Construction work and the toxic products of a thermal runaway event risk polluting sensitive watercourses.

The Applicant has failed to address any of these points, nor has a response to the Environment Agency's serious concerns been provided.

Landscape and visual

- For the most part, impact on the visual landscape, both for walkers using the PRoWs across the development site and adjacent areas, and for those residents with direct views has been dismissed as negligible. We disagree.
- Any perceived benefits from planting of trees would not be achieved until the second half of the project's claimed lifetime.

We have no reason to alter our views on these points.

Built heritage

- Assessment of impact on built heritage has focussed on structures in the immediate vicinity of the development site. Insufficient attention has been given to the large number of heritage assets across the local settlements.
- The settings of heritage assets have not received due consideration.

We have no reason to alter our views on these points.

Archaeology

- The Applicant's surveys have identified a number of interesting buried asset profiles. We endorse the LPA's officer view that these assets should be investigated further.
- No attempt has been made to survey the site of the proposed temporary haul road. This needs to be done, especially in the light of areas of particular interest identified in the northern section of the site.

Removal of Field 3 from the development area has reduced the risk of harm to buried heritage assets in that location. In other respects, we have no reason to alter our views on these points.

Traffic and transport

- The Applicant's intentions as regards the principal haul route for construction vehicles remain unclear. In particular, mixed messages have been given as to whether the route through Granborough would be used.
- We are not confident that the planned route for abnormal loads over the bridge on Granborough Road has received proper assessment of the capacity of the bridge to accept such loads.
- The total disregard shown for the safety of pedestrians, cyclists and equestrians on rural roads is disturbing.

We have no reason to alter our views on any of these points.

Climate change and carbon

- The Applicant has not provided a convincing argument for the scheme to have a net benefit on GHG emissions.
- The extent of energy wastage (estimated as 420 MWh per day), and its release as heat energy into the atmosphere, is a major issue that needs to be addressed.
- Carbon sequestration through newly planted trees would be a slow gain, most of which would be at the end of the scheme's claimed temporary lifetime.
- The Applicant has not provided clear evidence as to how or, indeed, whether the site would be decommissioned after 40 years and has not accounted for the associated GHG emissions or how the site materials (including Li-ion batteries) would be recycled.
- Required electrical storage capacity for 2030 is more than met already by existing and planned installations and that the predicted storage capacity requirement for 2050 could be achieved with a small additional number of brownfield developments. The carbon cost of manufacturing the proposed BESS plus the estimated huge energy wastage during operation means that savings on GHG emissions are unlikely to be achieved.

The Applicant has provided no information on the carbon footprint, efficiency, life expectancy or any other data in support of the revised plan. We have no reason to alter our views on any of these points.

Ground conditions

- The Applicant has underplayed the value of agricultural land classified as Grade 3b. Properly managed, this produces significant yields, especially for cereal crops and pastureland.
- The potential for altering the characteristics of neighbouring land and polluting sensitive watercourses has not been addressed.

We have no reason to alter our views on these points.

Land use

- The Applicant acknowledges NPPF guidance that the impacts of a development on food production must be taken into consideration, but no effort has been made to do so.
- The fate of 'disturbed soil' on the site and the feasibility of restoring the site to agricultural use are not adequately addressed.

We have no reason to alter our views on these points.

Cumulative impacts

- The cumulative impacts of the proposal with other planned and approved projects (including expansion of the East Claydon NG sub-station), as required in the LPA's Scoping Opinion, have received superficial consideration at best.
- The local area and its residents have suffered enormous inconvenience, stress and loss of amenity through the activities of major infrastructure projects such as HS2 and EWR. These activities continue and they leave a legacy of permanent damage to local infrastructure. The prospect of yet another such project is likely to be the straw that finally breaks the backs of local communities.

The Applicant has singularly avoided comment on the cumulative impact of other infrastructure projects in the area. We have no reason to alter our views on any of these points.

Conclusion

- We recognise the need to provide energy storage systems that facilitate balancing of supply and demand for electricity across the National Grid. However, we understand that existing planned and operating BESS sites exceed predictions for the necessary capacity.
- The proposed Li-ion battery technology is wasteful of energy and it is unlikely that the site would be carbon neutral over its operating lifetime.
- We do not consider the case to be made for transforming a rural, agricultural site in open countryside into an industrial development of a nature and scale that is likely to increase, rather than decrease, GHG emissions.
- We strongly object to the proposal.

The Applicant had the opportunity to make substantial revisions to their proposals in order to meet concerns of local residents but has chosen not to do so. This is regrettable and we are obliged to maintain our objection to the proposal.

Comments on Supplementary Documents

Environmental Statement - Landscape and Visual Amenity (Rev A)

5.4.33 Under 'Trends for Change', the Applicant refers to the approved Tuckey Farm solar installation and the proposed Rosefield solar installation but fails to mention the additional proposed BESS installation (24/02556/SO) by Statera's partner company, Statkraft or the proposed new National Grid sub-station. Their failure to do so is, at best, disingenuous. National Grid has indicated that no new connections can be made until 2030 pending construction of a new sub-station which, in itself, would have major cumulative impacts on the local environment and landscape.

We submit that the application cannot be assessed adequately until the Applicant has fully considered and assessed the cumulative impact of the proposed new National Grid sub-station. At the very least, routing of cables to the National Grid sub-station would have to be revised.

5.4.34 The Applicant shows ignorance of developments in the surrounding towns and villages, referring to them as 'minor infilling'.

Table 2: Assessment of Landscape Character. Under 'Use', the Applicant refers to the site as having no public access. This is misleading given that PRoWs border the site. The Scenic Value from higher vantage points around the valley (Granborough, Botolph/East Claydon and Quainton Hill – assessed as High value) is evident as part of the overall scene. As such, it cannot be considered just as an isolated entity, but as part of a wider whole.

The assessment of Landscape Value of the site as being Low to Medium and that of the immediate surrounding area 'Medium' underestimates the value of the wider vista of which the proposed development site is a part.

5.4.39 The Applicant correctly identifies that the *"Proposed Development will be out of keeping with the current rural character."* Adding to the electrical infrastructure that the Applicant states *"already has a strong influence on landscape character"* of the industrial presence of the National Grid sub-station," is not a justification for doing so.

The Applicant consistently avoids reference to the cumulative impact of the proposed construction of a new National Grid sub-station and so the claim, under 5.4.40, that *"Overall, the susceptibility of the Site to absorb this type of development is Medium."* has not been justified.

We strongly disagree with the Landscape Sensitivity (reiterated under 5.4.46) as being 'less than Medium'.

Visual Impact of the Development

Viewpoints (Appendix 5B – Winter)

Photographs for some views were taken April 2024 when trees and hedges were coming into leaf and under dull, cloudy conditions. One- and ten-year projections follow suit and so are not considered true winter projections.

Viewpoints (Appendix 5B – Summer)

Photographs, as reproduced in the document, are generally of poor definition and so do not provide an adequate impression of the impact of the proposed infrastructure.

In Section 5.8, there are assessments of the impact on views where Views 8 & 9 are considered to be moderately adversely affected but only View 8 has been visualised.

5.8.76 The Summary of Effects on Visual Amenity undervalues the amenity value of the existing visual landscape and underestimates the impact of the proposed development. Views from the Mushroom Shelter and field gates in East and Botolph Claydon are dismissed as 'fleeting' but these are points where walkers and cyclists stop specifically to appreciate the views across the valley below. Fig. 5.16 presents the Predictive Zone of Visual Influence once the mitigation has become effective. This indicates that the villages of Botolph and East Claydon and Granborough remain affected and yet the daily impact on their residents of Botolph and East Claydon has largely been ignored.

Apart from the single Viewpoint 22, there is no detailed consideration of the impact on views from East and Botolph Claydon or on the extensively used North Buckinghamshire Way and Bernwood Jubilee Way, even though some of the receptors (e.g. Nos 10 & 11) are considered to be of high sensitivity in Table 5.3. The Applicant has been highly selective in illustrating views, meaning that the true impact of the proposed development is not revealed. Views from locations such as Sion Hill Farm, Ivy Nook, the Mushroom Shelter, Botolph Farm, Botolph House and Bernwood Farm should have been considered.

5.5.3 We disagree with the statement that the site compounds are located outside the flood zone.

5.7.11 The Applicant acknowledges that the electrical infrastructure is perceived as a negative aspect of landscape character and the Proposed Development will reinforce that, resulting in a cumulative effect. However, the cumulative impact together with other proposed developments in the area are not considered here.

5.7.14 The Applicant refers to a freedom to roam in the nature area *including the orchard* but other documents indicate that the proposed orchard has been removed from the plans.

Table 5.7 (View 20) It is totally unacceptable and, indeed, unsupportable to state that there is no effect because ***"The solar farm panels will block the view towards the Proposed Development."*** The full DCO application for the solar energy installation has yet to be submitted and so the Applicant has no basis for making this claim. Added to this, in other respects the Applicant has failed to consider the cumulative effects of other developments in the area.

5.9 Cumulative Landscape and Visual Effects

5.9.2 The Applicant acknowledges that the proposed development, together with approved plans for the Tuckey Farm solar installation, would increase the amount of electrical infrastructure around the East Claydon Sub-station, although it seeks to cast doubt on whether the Tuckey Farm development will proceed. They go on to argue that the sub-station represents an LCA transition zone as a justification for the proposed BESS. Under 5.93, it argues that the cumulative effect on the perceived character of the wider Claydon Valley and Hogshaw Claylands LCA would be Negligible. In making this statement, there is no acknowledgement of the proposed new National Grid sub-station, the proposed Rosefield solar installation, Wings Farm solar installation or further BESS installation by their partner company, Statkraft (24/02556/SO).

In other closely related proposed electrical infrastructure developments, the Planning Authority has made it clear that the cumulative impact of other known projects must be taken into consideration, both for the construction and operational phases. The Applicant has failed to make any genuine attempt to do so. As such, the application is incomplete and flawed. We submit that it should be rejected on that basis.

5.9.4 The Applicant makes the point that HS2 is too far distant to have a cumulative impact as regards landscape. We disagree. There are the obvious negative impacts on local infrastructure, notably the destruction of roads, loss of trees, damage to grass verges, etc. of both HS2 and East-West Rail. This would be further exacerbated by the proposed development. However, the Applicant is correct in saying under 5.9.5 that the landscape around the substation will be perceived as one in which electrical infrastructure is a defining feature, which is an adverse cumulative effect.

The cumulative impact of the proposed scheme, alongside others, on users of PRowS is of particular concern. These footpaths and bridleways constitute a major part of the daily recreational activity of local residents. The cumulative destruction of much-treasured views and landscape character will have an important and irreversible impact on quality of life both for residents and the many users of the PRowS drawn from a wider area.

Decommissioning

5.10.1 The Applicant states that, after the 40-year proposed lifetime of the development, all the equipment, buildings, concrete foundations, fencing, underground cables, drainage pipes, gravel and hard standings will be removed and topsoil returned. However, doubts are raised in the document as to whether the sub-station element would be removed.

In Table 5.8: (Summary of effects on landscape character on decommissioning) claims are made that the effects will be beneficial or neutral. This is an absurd position given that decommissioning involves reduction in damage caused to the landscape and visual amenity through the construction of the BESS.

Landscape and Visual Addendum

The Applicant has summarised changes to the original plans and their assessment of the impact of those changes. Whilst removal of proposed electrical infrastructure from Field 3 is a positive development, we disagree with the Applicant's assurances on the extent of the negative effects on landscape quality and visual amenity.

Wintering Bird Survey Report

The Wintering Bird Survey was undertaken during a 4-hour period on 12th February 2024. We submit that this is a completely inadequate period to determine the true populations of wintering birds. Added to this, there was extensive flooding across this area of North Buckinghamshire at the time. This would have adverse effects on the availability of foraging sites and on the behaviour of wintering birds and so the results would not be representative of the true picture. We consider the study to be invalid.

We note that Fig. 2 shows the original planned layout for the BESS infrastructure which suggests that there is poor communication between the project team and its sub-contractors.

This raises concerns as to the consistency (and, hence, validity) of information presented to the planning authority.

Landscape and Ecological and Management Plan

This document sets out Management Tasks (Section 7), Avoiding Potential Threats to the Natural Environment (Section 8), Achieving Biodiversity Net Gain and Habitat Monitoring Tasks (Section 9), Decommissioning (Section 10) and Implementation of the LEMP and Responsible Organisation.

The various objectives and tasks are all aspirational and we can find no assurance that, were the Planning Authority minded to approve the application, these would be implemented over the proposed 40-year lifespan of the development. These concerns are amplified considerably by the statement under 11.1 reproduced here:

“11.1. The Site will be managed by the company which builds out and operates the facility (currently East Claydon Storage Ltd.). For the first year after completion of the landscaping works the landscaping will be managed by the implementing landscape contractor in accordance with the LEMP and under the terms of the first year Defects Liability Period clause within the landscape contract. In subsequent years the landscape maintenance shall continue in accordance with the LEMP but may be awarded to a third party landscape contractor by the organisation responsible for the management of the facility. This arrangement may periodically change subject to commercial terms and the performance of the landscape contractor; however, the operating company will always ensure that a landscape maintenance contract is in place for the duration of the operational life of the facility and implemented in accordance with the LEMP. The arrangement of ecological monitoring, and payment of associated fees, will be the responsibility of the management company operating the Facility.”

This anticipates multiple changes in ownership of the facility over a period of years and fails to indicate how performance against the LEMP will be assured or policed by the Planning Authority. It adds further doubts to the extent to which the site would be restored to its pre-development condition. Funding of the decommissioning process does not appear to be guaranteed by the statement under 11.1.

Various estimates place **more than half of all species** in the soil. The Applicant plans to strip topsoil from the development site but has not indicated the fate of that soil.

- How has the Applicant estimated the loss of biodiversity and carbon content through removal of topsoil?
- Where does it figure in their calculations of the overall carbon footprint of the project and on the biodiversity gain?
- What is the fate of the stripped soil and what will be the source of replacement topsoil at the time of decommissioning? Under 3.1 of the Landscape Specification document, it is suggested that it would be redistributed in Field 3. However, under the revised plan, Field 3 is to be retained in agricultural cultivation and so this is not a viable option. This is another example of how documents are inconsistent across the application.
- If topsoil is imported from elsewhere at the time of decommissioning, what will be the impact on the local biodiversity and soil characteristics?

Objective 5, under Section 6. Landscape and Ecological Objectives and Strategies, states “Increase ecological corridors across the Site, particularly for commuting bats.” This needs to be considered, not in isolation, but alongside an assessment of the cumulative impacts of this and other proposed developments.

There are no entries under Appendix E: Criteria for Monitoring Habitat Conditions as they Establish or Appendix F: Erection of Nest Boxes, suggesting that the document has not been checked or finalised.

Preliminary Ecological Appraisal

This document, dated November 2023, appears to be identical with that ES VOL 3 APPENDIX 2 on 12th December 2023. We have been unable to identify any changes between the two documents. Of the 19 recommendations made in that report, how many have been completed in full?

Spring Static Bat Detector Study

The Applicant needs to explain why detectors were stationed in only three of the four fields considered as the site or the route of the haul road from East Claydon Road, which is close to the Claydon Brook and likely to be a key foraging route.

Landscape Specification

Although stated as having been updated to take account of the revised layout of the proposed development, it has inconsistencies that need to be addressed. For example, topsoil storage and redistribution under 3.1 is not a viable option under the revised scheme.

Biodiversity Net Gain Assessment & Reasoning for Proposed Habitat Creation and Enhancement at East Claydon BESS

This document has not been formatted correctly, making it very difficult to read in places. The accompanying spreadsheet (see Section 3.3) setting out the BNG calculations has not been provided.

Tables 4.2-4.5. The Applicant needs to explain the discrepancies in baseline values quoted compared to those provided in the previous version of the document. What credence can be placed on these values? There is no explanation as to what impact the revised site layout has had on projected post-development values or how that has been determined. Have the biodiversity baseline scores for Field 3 been removed from the total baseline values?

Section 5 (Conclusion) leaves the reader in doubt as to the reliability of the document given that it refers to inclusion of ‘*traditional orchards*’ in the scheme when there is now no provision for them.

The Conclusion also refers to securing habitats for 30 years when the projected lifetime for the scheme is 40 years.

National Fire Chiefs Council Compliance Statement

Although dated July 2024, it is not clear to what extent the entirety of the document reflects the revised layout of the battery units.

The Applicant states that, *“It is recommended operational practice that due to the potential electrical hazard, no firefighting operations would be undertaken until a member of the Statera Operations Team is in attendance to advise as appropriate.”* This raises questions as to the overall response time in the event of an incident. How long would it take for a Statera representative to attend the site? In addition, the geographic distribution of Buckinghamshire Fire & Rescue Services is such that response times for crews required to deal with a major incident are likely to be considerable.

The Fire Safety at Planning Stage & NFCC Guidance Compliance Note submitted is a document signed off by a member of the Applicant's own planning team, rather than an independent source. As such, it is a case of the Applicant marking their own homework and so lacks credibility.

There is no assessment of the impact of the revised, high-density layout of battery storage units and associated electrical infrastructure on the risk of fire or other hazardous event, or on the fire and rescue services ability to deal with an incident. Do the conditions of the testing regimes submitted as appendices reflect the planned arrangements in the revised scheme?

The battery containers are to be fitted with vents and relief valve systems which means that the risks of toxic product emissions to the atmosphere remain in a thermal runaway incident. Has the composition of smoke and other particulate matter emitted during thermal runaway been determined? What are the results?

Site access. This remains a key concern. In our view, the requirement for two separate access points capable of accommodating FRS vehicles in all weather conditions has not been met. Only a single access road from the Hogshaw Road has been allowed for. This divides on-site but does not appear to allow for ‘all weather conditions’ (e.g. wind direction directing toxic products from thermal runaway towards the access point).

Fire water. Table 1 indicates that on-site water tanks are required to provide at least 1,900 l.min⁻¹ for 120 min which equates to a total of 228,000 litres. In the Block Plan for the required scheme, there appear to be three water storage tanks, reduced from four in the original plan. If, as stated, the storage capacity of each tank is 58,000 litres, this gives a total capacity of 174,000 litres; well short of the volume required.

Little detail is provided on arrangements for the management of water run-off in the event of a fire. We are not confident that guarantees can be made that the local watercourses would not be contaminated. (This point is also raised by the Environment Agency in its letter of 5th June 2024 to which there appears to have been no response by the Applicant).

Other Matters

Flood Risk

We have raised serious concerns about the extent to which the proposed development site and the surroundings area are prone to flooding. We pointed this out to the Applicant's representatives during consultation events, but it appears to have fallen on deaf ears.

The high rainfall patterns of the winter of 2023-24 resulted in extensive flooding in the area over extended periods. During these periods, in our estimation, the proposed haul route would have been impassable. The East Claydon Road was subject to serious flooding on multiple occasions. The Environment Agency has pointed out that its own flood zone mapping does not necessarily represent an accurate picture and yet the Applicant has chosen not to conduct an on-site winter flood assessment. We find it extraordinary that a proposal for a multi-million pound, infrastructure project such as this has failed to undertake this most basic assessments, especially given the availability of local knowledge that was shared with the Applicant.

The Environment Agency and Internal Drainage Board reservations on flood risk and security of watercourses remain unanswered. Granting planning approval without proper evaluation of these issues and development of robust solutions would be a highly risky course of action.

Safety

Since submission of the original application, the Applicant has had ample opportunity to respond to residents' concerns over safety issues on the proposed haulage route along East Claydon Road. However, we are not aware of any modifications to the proposals as submitted and so this remains as a major issue for pedestrians, cyclists and equestrians.

Carbon Footprint and Sustainability

In our previous consultation document submitted to the Planning Authority, we considered in some detail the Applicant's claims on greenhouse gas emissions associated with the project. We found that when all aspects of the project are considered, it is unlikely to be carbon neutral over its proposed 40-year lifespan. The Applicant has done nothing in the supplementary documents to dissuade us of that view and, indeed, the process of downloading and subsequent uploading of electricity back to the grid is highly wasteful of energy.

Cumulative Impacts

The Applicant has failed to engage adequately on the cumulative impacts of other local planning proposals. Most notably, National Grid has stated its intention of constructing a new sub-station on a site close to the existing installation. This has implications not only for the cumulative impact of the present BESS application but it also questions when connection of the BESS to the grid could be completed. National Grid has indicated that this could not occur prior to 2030, contrary to the assertions of the Applicant. In any event, connection to a

new sub-station would require alternative cabling arrangements for the BESS and so a complete application cannot be submitted until such time as the National Grid plans become clear.

Currently, we are aware of the following electrical infrastructure planning proposals at various stages of the planning cycle:

- 19/00983/APP (Tuckey Farm solar installation – approved; 63 hectares)
- 23/03875/APP (Present application – Statara BESS; 33.2 hectares)
- 23/01939/SO (Wings Farm -solar installation; 12 agricultural fields – area unspecified)
- 23/03613/DCO (Rosefield solar installation – consultation; 875 hectares)
- 24/02556/SO (Statkraft BESS; 41.9 hectares)
- New National Grid sub-station; area unspecified.

Of the known projected land take, this amounts to a total of more than 1,000 hectares (>2,500 acres) of agricultural land. The unspecified areas would consume substantially in excess of a further 100 acres. If approved, the combined projects would turn the entire Claydon Valley into an industrial site.

We urge the Planning Authority to give serious consideration to the implications of this, not only to the landscape quality and visual amenity but to the loss of livelihood for tenant farmers, loss of food production, destruction of the local rural economy and threats to the viability of a nationally important biotechnology business.

The Public Goods

In considering the weighted balance when determining the planning application, the Applicant needs to provide a strong case in favour of development with regard to its positive vs negative contributions to public goods. However, no attempt has been made to discuss the impact of the revised plan on this important point. The principal benefit would be a theoretical contribution to the stability of the National Grid. However, in order to achieve this, the BESS has to be connected to the grid. Representatives of the National Grid have stated publicly and in writing that no such connections could be made until such time as a new sub-station is constructed and commissioned. The very earliest this can be anticipated is 2030. Given the rate of technological change and the number of electricity storage facilities already approved or operational, the target for storage capacity is likely to be met by that date.

The Applicant has suggested that the project will contribute to the Government's target of achieving net zero carbon emissions by 2050. It is self-evident that the BESS cannot distinguish between electricity generated from renewable and non-renewable sources. As such, the magnitude of any contribution to storing energy generated from renewable sources is unknowable and so it has to be considered primarily as a grid balancing facility. From the Applicant's own estimates, it is highly debatable as to whether any perceived reductions in carbon output throughout the lifetime of the project will be balanced by any benefits through storage of energy generated from renewable sources. Based on those estimates, more than 1.5 million tCO₂e will be released into the atmosphere just through the construction phase (ignoring major additional factors such as shipping). There is the further issue that 420 MWh of electricity will be lost **each day** as a result of inefficiencies in the transfer to and from the grid. This will be dumped as waste heat into the atmosphere around Granborough and East Claydon. We refer to our comments under "*ES Vol. 9 – Climate Change*" (pp63-64 of our earlier Consultation Response) for more detailed consideration of this point. In our view, the case for carbon neutrality is not made.

Energy security is a stated aim of Government policy. Whilst operationally, it may be argued that the BESS could contribute to stability of the electricity supply network, construction and maintenance of the plant during the operational phase is entirely dependent on supplies of batteries and other infrastructure from China. This makes it no different from dependence on other countries for supplies of fossil fuels and so the BESS makes no contribution to energy security.

Public goods include freedom to enjoy the surrounding landscape, use of PRowS, safe use of roads and clean air, as are lack of pollution entering our atmosphere or watercourses and absence of noise pollution. Exacerbation of flood risk and loss of food production does not contribute to the public goods.

Taking these points together, it is difficult to see how the weighted balance for public goods would favour approval of the project, given its limitations as presented.

Implications of Granting Planning Approval

We are aware that there is considerable pressure on planning authorities to approve electrical infrastructure, especially those involving generation of renewable energy. This is not such a project. It does not generate renewable energy, indeed it is projected to waste around 420 MWh per day as heat into the atmosphere and, as noted above, it is not carbon neutral.

We trust the Planning Authority will recognise that major issues we have identified in the application have not been addressed and decline approval. Notwithstanding these serious unresolved issues and their consequences for the local community and environment, were the Authority to grant approval, we respectfully request that it should be subject submission of satisfactory resolution of the following issues:

- Full, on-site flood risk assessment and appropriate mitigation to prevent exacerbation of existing flooding issues and, indeed, resolution of them;
- Full and satisfactory assessment of the safety risk profile of the revised scheme; resolution of site access defects for Fire and Rescue Services; detailed plans for capture of fire water run-off and its disposal;
- Improvements to road safety measures;
- In recognition of the destruction of local amenity and disruption to the local community, substantial financial contributions would need to be made to improve facilities in East and Botolph Claydon;
- Secured arrangements for decommissioning of the scheme after 40 years.