LOSRA continues to object to the Sunbury BESS following publication of the latest application documents:

 It remains a novel, large-scale industrial development that is totally inappropriate for suburban Green Belt on land which Spelthorne BC considered as playing 'a fundamental role with respect to the wider Green Belt local area' and stated that 'its release would harm the performance and integrity of the wider strategic Green Belt.' (Area 38a in the Arup Report).

 The application is lacking in detail, and much of that which is provided remains preliminary and sometimes wrong or inconsistent. In fact its Framework/Outline Safety Management Plan (F/OSMP) describes the scheme as being at 'conceptual development stage' – hardly appropriate for a Full Planning application. The Applicant seems to consider that much of the fundamental safety and planning requirements of the scheme would be provided either by attached planning conditions – many of which would require the input of specialists – or provided after approval has been granted. The actual Conclusions/Recommendations of the F/OSMP (Section 4) are almost entirely conjectural, noting in 4.2.3 that 'It is understood that the formal requirement covering the provision of further details (i.e., an updated Safety Management Plan) will be facilitated via a suitable condition to be incorporated into the planning permission.'.

 Although the Applicant has still not provided any drawings giving a realistic view of the overall scheme's appearance, it is not difficult to imagine what 144 industrial containers spread over nearly a hectare of land would look like. It is therefore somewhat strange that SBC's own updated EIA Screening Document for the application (published on 19 April 2024) states that the 'proposed facility would not include any significantly tall structures, such as chimneys, and would not be visible'. It would of course be very and disturbingly visible, particularly from the Public Rights of Way (#70 and #86) which cross and/or run around the application site.

 The application continues to make a number of unconvincing claims to justify the scheme, including that:

 It is supporting the rural economy – in spite of it being proposed as an unmanned operation with its major infrastructure (the batteries) imported from China and located in a suburban area less than 2 miles from the Greater London boundary. A further justification is that it will provide an alternative income for 'the farmer'.

 It is a temporary installation – in spite of it being proposed for a lifetime of 40 years, way beyond that of most existing residents and impossible to guarantee so far into the

future. It is surely inconceivable to believe that a resident might support a forty-year lifetime development but not a ‘permanent’ one?!

 It is designed to store renewable energy – in spite of it being linked directly to the National Grid, which serves as an electric energy pool for all generation, irrespective of whether it is thermal, nuclear or renewable; it cannot be differentiated. A BESS installation could certainly have its uses but it is a profit-making enterprise with an impressive potential rate of return that can buy and store wholesale electricity when supply is abundant (price=low) and sell it when demand increases (price=high). There is no inherent requirement for it to store renewable energy, and indeed there is very little renewable energy generated at grid level in Spelthorne.

 The safety aspects of a very large-scale Lithium battery installation are the most concerning. The previously mentioned F/OSMP, in presenting ‘an initial appraisal of risks’, categorises the severity of most (13/17) of the assessed risks as being ‘catastrophic’, which it defines as ‘capable of causing death and illness and major system, property or equipment loss’. The fact that the assessment goes on to define the likelihood of such risks as being ‘improbable’ is justified in the F/OSMP by assuming that suitable IT monitoring and control systems and linked automated firefighting installations will always work perfectly together in what will be an unmanned facility. This would include the onsite storage of 225,000 litres of water - sufficient to fight a battery fire for just two hours. This requirement was included in the 2023 National Fire Chiefs Council’s ‘Grid Scale Battery Energy Storage System planning – Guidance for FRS’, which was produced following a battery module explosion and fire in a very much smaller BESS installation in Liverpool in September 2020. That incident took not 2 but 59 hours to put out!

 Although the Surrey Fire and Rescue Service (SFRS) is a statutory consultee on the application, it responded on 12 February 2024 to the effect that they had been unable to access the application documents and could therefore only provide an informal response, which included their saying that they ‘have no objections at this stage and will await (where necessary) any statutory consultation(s) that may follow’. This seems rather an extraordinary response from what is surely one of the key consultees - but one that appears not even to have had sight of the actual scheme documents.

 At LOSRA we have many other concerns with this application, including – but not limited to -

uncertainties about the drainage arrangements that will need to contain the huge amounts of toxic water run-off in the event of a fire, access arrangements to the site, and the means by which the 132kV high-voltage capable would connect the BESS switching compound to the National Grid connection point 3.5kms away. These may be covered in an additional article.