

## BESS is Back – But What Has Changed?

On 11 June, a number of new documents appeared on the documents list for the Sunbury BESS planning application, the first from the applicant since consideration of the revised scheme was deferred just before the December 2024 planning committee meeting.

The documents, nine in number, included a Planning Addendum, two diagrammatic site plans, two amended flood risk assessments, a Ground Investigation Report, a Landscape Addendum and the two previously submitted Very Special Circumstances Reports with some 'minor errors' corrected.

The Addendum describes how the scheme has been amended to address the reasons given for the recommendation of planning refusal back in December. The major change is given as a halving of the area of the BESS installation, resulting in a reduction from 200MW output and 400MWh capacity to 'circa 100MW' output and 'circa 200MWh' capacity.

The applicant is not only claiming that the reduction in size, combined with revised landscaping plans, overcomes the reasons for refusal on the basis of inappropriate Green Belt development - but also that the site area should really be defined as 'Grey Belt' anyway and therefore suitable for such development. The Environment Agency's recommended refusal was due to the issues related to the site's historic use for landfill and the resulting unknown characteristics of surface drainage water passing through the landfill layers. The applicant is claiming that a survey of boreholes conducted earlier this year shows that the risk of drainage water getting polluted while passing through landfill layers 'is considered to be low and can therefore be sensibly discounted.'

So the applicant has submitted a substantially altered scheme but with, so far at least, remarkably few revised plans or documents on which it might be assessed. There are, for instance, no revised elevation or section drawings available (as is surely required under items 4,6 and 9 of the Spelthorne Local List of Planning Requirements), so we have little idea what this new scheme would look like. The two submitted Very Special Circumstances reports, which are key to arguing why such an industrial facility should be built on Green Belt land, still refer to the larger revised scheme that was submitted for planning back in September 2024. And there is as yet no revised Design and Access Statement to align with the substantially altered scheme.

There is however now an additional document, which does not seem to have been submitted to the planning authority but has instead been included in an email to some local residents along with an invitation to attend an exhibition of the scheme on 23 June. This two-page document is titled 'Fire Safety Statement – Sunbury BESS' and appears designed to document steps that the applicant has or will take to address the fire issues related to lithium batteries. In doing so it claims to be following all current advice and guidance and includes a reference to the latest guidance document produced by the National Fire Chiefs Council (NFCC). However, this NFCC document includes the following:

### **'15: Site Location**

*The choice of BESS site and the associated safety measures should account for the impact that an incident on the site could have on the local environment. A plan should be prepared to assist in discussions with developers and planners regarding the suitability of a site location highlighting all sensitive receptors within a 1km radius of the site to allow for appropriate emergency planning... Whilst incidents involving BESS are relatively rare at the time of publication, the impact of an incident could be protracted and may have an impact on business continuity in the area adjacent to the BESS. Given that all fire safety principles and design documents in the UK are predicated on the fact that an incident*

*/ fire will occur i.e., one fire at one time; an assessment of the impact of an incident on the surrounding area should be undertaken to consider the business continuity and neighbourhood disruption.'*

It would seem that this plan has yet to be produced by the applicant, but it certainly should be provided as part of the submission before any further planning decisions are made. A one kilometre radius of the BESS site contains a range of significant 'sensitive receptors' which all represent good reasons why it is inappropriate to build a BESS on this site. These include Charlton and Upper Halliford Villages, Ashford Common Water Treatment Works, the Eco Park, Upper Halliford Station and railway, M3 motorway, The River Ash Nature Reserve and Queen Mary Reservoir. This impact document surely needs to be produced ahead of any assessment of this revised scheme!

Continuing with the fire theme, there is still no evidence produced to show that the drainage system is designed in such a way as to prevent any contaminated fire-fighting water from entering the water table. The site diagrams of the new scheme appear to show the same 9 x 25,000 litre water tanks on site that are supposed to support the fire-fighting process, given that no mains water hydrants are being provided. The previous scheme included a certain volume of gravel storage beneath the batteries area to contain the water, but it did not appear that this was sufficient in volume to do so. Since the new scheme is around half the area, the depth of such gravel containment would therefore need to be very significantly increased – but has it? We do not know because we do not yet have all the relevant updated documents.

So, given that this new scheme, although smaller and with a modified landscaping plan, appears - on the basis of the limited documentation provided to date - to retain all of the inappropriate characteristics and dangers of its larger predecessors, we will continue to object to its being granted planning approval.