

REASONS FOR REFUSAL



1. CUMULATIVE EFFECT

The parish is in danger of becoming a community under siege from the cumulative effect of **4 current proposals** within the parish boundary, so far. 3 of these are for large scale battery energy storage systems (BESS) with additional substation equipment and 1 is a combined solar / battery site. See map.

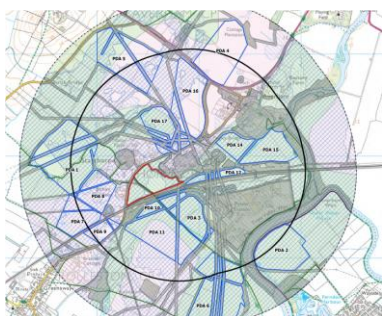
2. PREMATURITY

Because of this cumulative effect, the 2 BESS proposals currently at planning application stage i.e. 22/01840/FULM and 23/00317/FULM should be considered jointly. See area 1 and 2 on the map respectively.



3. FLOOD RISK

100% of the site is within Flood Zone 2 & 3, with two thirds of the site in Flood Zone 3b ie. at the HIGHEST risk of flooding. This is forcing all the equipment to be placed on stilts, which in turn increases the height of equipment and, therefore, the visual impact of the site. **Against NPPF, Core Policy 10 and DM5, this is an inappropriate development that CAN be avoided and is NOT being sited here for operational reasons.** (pg 25 Report to Planning Committee)



4. FAILS SEQUENTIAL TEST

The application FAILS the Sequential Test even when the search area was limited to just 1km. A site of similar size in Flood Zone 1 (ie. PDA16) was deemed unsuitable. However, this site is pending consideration by the Planning Department under reference 23/00317/FULM – **this weighs significantly against the proposal.** (pg 29 Report to Planning Committee)



5. AGRICULTURAL LAND LOSS

Loss of 10.1 hectares (25 acres) of good to moderate quality agricultural land, 70% of which is Grade 3a (Best and Most Versatile or BMV) - **this weighs heavily against the proposal.** (pg 25 Report to Planning Committee)



6. TREES AND LANDSCAPE

Councils Tree Officer states that the current design does not comply with NPPF. In accordance with the Hedgerows Regulations 1997, the 110m of ancient hedgerow to be removed is of ‘importance’ and is considered significant and the trees to be removed are important to the character of the area. Adequate justification for removal has not been provided which includes exploration of alternatives or restoration of canopy coverage within 3 years. **This weighs against the proposal.** (pg 15 / 46 Report to Planning Committee)



7. LANDSCAPE AND VISUAL HARM

Amongst MANY issues regarding the landscape and visual harm caused by an over intrusive large scale industrial development in open countryside directly opposite residential properties & either side of public right of way. The landscape assessment also FAILS to take account of the cumulative effect alongside application 23/00317/FULM. The major adverse landscape and visual harm *eventually* reducing to moderate is **one of the most significant impacts of the residential amenities of local residents which weighs against the proposal** and the magnitude of change along the public right of way would remain **large and the visual effect defined as moderate-major**. (pg 60 / 40 Report to Planning Committee)



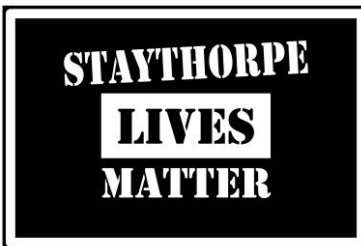
8. HEALTH & SAFETY – FIRE RISK

There is genuine fear and apprehension about the overall safety of the site. This is UNREGULATED and NEW technology with a proven RISK of FIRE, EXPLOSION and TOXICITY. With NO examples of large scale BESS ANYWHERE in the UK, the overall risk can not be proven and can not be completely removed. The fear of fire, therefore, remains a **negative weighting against the proposal** (pg 58 Report to Planning Committee)



9. HEALTH & SAFETY – NOISE

An inadequate assessment of background noise was undertaken which presents results at ground level and NOT at head height. Equipment selection has not been finalised so the contents of the current Noise Assessment and associated addendum can not be construed as either accurate or robust. NO clear account has been taken of wind direction in these documents. Unlike Staythorpe Power Station, NO condition on noise limits has been recommended. **This lack of clarity and protection leaves residents susceptible to excessive noise levels, particularly at night**. (pg 61 Report to Planning Committee)



10. LACK OF COMMUNITY SUPPORT

Overwhelmingly objected to by local residents (76% were AGAINST in a local survey by Staythorpe BESS Action Group) 118 letters of objection received by NSDC Planning with objections from Averham, Kelham & Staythorpe and Rolleston Parish Councils NO LOCAL COMMUNITY BENEFIT ONLY LOSS AND NEGATIVE IMPACT (pg 15 / 13 Report to Planning Committee)

CONCLUSION

In the absence of ANY UK health and safety legislation, and ANY legislative guidance on the construction and operation of Large Scale Battery Energy Storage Systems and specifically on siting these is such close proximity to residential areas, you must be ABSOLUTELY CERTAIN, with NO DOUBT, about the health and safety risks created by siting such a large scale industrial development on this land.

This is NOT a RENEWABLE ENERGY SCHEME NOR is it a SOLAR DEVELOPMENT

There is NO proven evidence to support a NEED for energy storage on THIS SITE

It is an OVER BEARING and INTENSIVE LARGE SCALE industrial development in Open Countryside, just 14m from the nearest property and within 120 m of the rest of Staythorpe.

It also fails to satisfy NSDC Local Development Framework Core Strategy & Allocations, including the Adopted Core Strategy (ACS) and Allocations and Development Plan (ADMDP).

Essentially, the proposal is deemed **TOO BIG, TOO CLOSE and TOO DANGEROUS** and should be **REFUSED**.