Planning Application: 2025/1689 – Long Stratton BESS, Market Lane, Great Moulton

Wacton Parish Objection Letter

We are writing to object to the proposed 400MW Battery Energy Storage System (BESS) at Market Lane, Great Moulton. Collectively, we are extremely concerned that this application is premature, unsafe, and based on infrastructure that does not even exist or have full planning consent.

Reason for objection are stated below:

1. There is no Confirmed Grid Connection – NESO have not approved this site

The applicant does not have a confirmed Point of Connection (PoC). NESO has:

- Not approved a PoC
- Not confirmed the location of any new substation
- Not confirmed capacity
- Not confirmed timing
- Not prioritised this project

The applicant's grid agreement is conditional and may require a redesign or even a total void for the connection altogether. A development of this type and scale cannot be approved when the grid connection is uncertain and unconfirmed with reliance on NSIPs that do not have consent.

2. Site Selection is based on speculation, not formal evidence

Neither NESO or East Pye have confirmed anything or received planning consent. Therefore, the below points are not valid:

- Area of Search
- Alternative Site Assessment
- Needs Case
- "Strategic location" claims

These are all based on speculative infrastructure with planning decisions yet to be made, this application cannot rely on infrastructure that does not exist.

3. Highway Safety – The Transport Statement shows that the site is not viable

The HGV traffic impact on Flowerpot Lane, Stratton Rd, Hall Lane, and Market Lane are unacceptable and severe, *as per the Transport Statement & Construction Traffic Management Plan 10110924 (Dec 2025) Table 4 on p.10*. As you can see from the below snip there will be a huge increase and impact of HGVs in this area:

Table 4: 2030 Base + Construction Traffic Flows / Traffic Impact

Description	Cars & LGV	HGV	Total Traffic	Cars & LGV % Impact	HGV % Impact
Ipswich Road (North) / The Street	17,997	599	18,596	0.02%	0.00%
Ipswich Road (South)	16,339	629	16,968	0.23%	5.42%
Flowerpot Lane (East)	4,483	101	4,584	0.95%	46.88%
Flowerpot Lane (West)	2,929	50	2,979	1.45%	179.72%
Stratton Road	1,738	56	1,794	2.48%	134.79%
Hall Lane	1,480	43	1,523	2.92%	294.08%
Market Lane	1,293	41	1,334	3.36%	359.43%

As noted on the IEMA RTA Guidelines, a **>30 % increase in traffic or HGV flows** usually triggers detailed assessment and where flows increase by **≥10 %** in **sensitive** *settings* (e.g., narrow rural lanes, near schools or residences), that too may be considered significant.

All surrounding roads are narrow, without footways, used by walkers, cyclists, horse riders, school traffic, agricultural vehicles, and elderly residents.

The applicant has not demonstrated that HGVs **(particularly the abnormal load traffic)** can pass safely without breaking Highway code.

Furthermore, *referencing point 4.3 of the Transport Statement & Construction Traffic Management Plan 10110924 (Dec 2025) on p.11,* you can see that the transformers will be loaded onto a specialist AIL trailer. According to the report - **This is 7.4m in length x 3m in width x 4.4 in height with no AIL access inspection report or AIP approval for its route.** However, if you look at Appendix 3, you will see vastly different dimensions of the AIL. This shows the huge five axle bed five axle draw bar trailer concept vehicle measuring **36.1637m in length x3.6m in width and 4.94m in height** (once reduced by suspension).

Many of the existing rural narrow roads will not be able to take the **116-tonne load**, there is high potential of catching overhead power and telephone lines on Stratton Rd and Hall Lane, the mounting of curbs and oversailing verges on both sides of the road and footpaths around the tight bends as **per Appendix 4. Swept Path Assessment**. This is even mentioned as the strategy to allow blue light emergency services to pass the AIL load and HGVs when travelling, *p.19 Emergency & Contingency Plan*, many of the roads don't have the space to allow for this AIL load or HGVs to mount the "verge" safely whilst also giving enough room for the blue light services to pass.

Many areas of the oversailing tracks would be on third party land including some of the proposed passing places – none of these have the landowners or Highway consent. The fact that the AIL would need to mount the verge and heavily "prune" vegetation in many areas, clearly shows that this site is not viable for such a development or vehicle use.

The site access still does not evaluate the Fire Emergency vehicles/HGV and whether they can access the emergency entrances to the site safely.

This development would create serious safety risks for residents and public using the highway on the proposed traffic routes.

4. Flood and Drainage Concerns

The Flood Risk Assessment is incomplete and does not:

- Model exceedance routes.
- Assess firewater contamination and remedial strategy.
- Consider groundwater pathways.
- Assess the impact of land raising.

5. Fire Safety – No Fire Strategy or Thermal Runaway Assessment

The application does not include:

- A Fire Strategy with coordination/involvement of Norfolk Fire & Rescue Service
- An emergency response plan with the local fire service
- A specialist training programme for and with the Norfolk Fire & Rescue Service
- A thermal runaway assessment
- A firewater containment plan
- An explosion control system, as per NFCC recommendations for BESS
- A fire hydrant/s located near the BESS (capable of providing a minimum of 1900 l/min for at least 2 hours) – which would also require Anglian Water confirmation of connection & capacity, as per the Fire Officer's previous comments in June 2025.

Lithium-ion battery fires are self-sustaining chemical fires producing extreme heat, toxic and explosive vapours, and risk of reignition long after initial suppression (if it is achieved at all). These fires can burn for extended periods and produce hazardous/contaminated runoff with huge environmental impacts.
As per NFCC, manual firefighting to lithium-ion fires cannot be extinguished with water alone – specialist suppression and training is needed. There is limited reliable data on the most effective tactical suppression approach meaning that when a fire occurs, it is highly likely to remain out of control until all battery cells have ignited and burnt out. This will mean a total contamination disaster of the local area, watercourses, air pollution, and ground contamination throughout South Norfolk and potentially beyond.

When a battery catches fire, if water is used to control the fire, it can become contaminated with toxic chemicals, including:

- Electrolyte residues
- Heavy metals (cobalt, lithium, nickel)
- Flammable decomposition products.

There is no indication of a full containment structure to collect all the contaminated firewater in this event to prevent it is spread into the attenuation basin, underground water routes, nearby waterways.
To conclude If a comparison is carried out on the revised site plan versus the previous submission, it can be seen that the battery units are placed closer together, and there are fewer access ways amongst the battery units. True, Field has stated that since the previous submission they are going to use different battery units, and this has resulted in a 20% reduction in the overall site area. Field is still reliant on the battery unit's safety measures and the unit construction in being able to contain any fire that occurs. If a fire was to break out, the

potential for adversely affecting neighbouring battery units appears to be greater due to the closer positioning. If a fire were to break out in a unit in the middle of a cluster, then access may be more difficult due to the surrounding units. Hence the need for a thermal runaway assessment plan.

Field state that development / build is likely to proceed in 2030. Given the timescale that has seen a change of battery unit, what batteries will be available in another four years? Potentially solid-state batteries? Field will need to keep updating their plans / proposal during those years. Battery development doesn't stand still. For example, for cars it is likely that the Japanese will start building solid-state batteries in a couple of years.

The water tank proposed in the summer application is still sized as before, i.e. it will provide enough for 2 hours at the required flow rate – but that's it. Maximum capacity of the tank is 352,340 litres. The fire strategy needs to be updated to cover if multiple battery units were to be affected by fire due to the greater density of the units.

The applicant has not demonstrated how a fire would be controlled, how firewater would be contained on site, or how emergency vehicles would safely reach the site and deal with a battery fire.

6. Noise, Landscape, and Environmental Harm

The proposal would cause:

- Significant landscape and visual harm to the rural setting
- Industrialisation of open countryside
- Operational noise impacts
- Construction noise and vibration
- Loss of tranquillity
- Mental harm to local communities (inc special needs and the elderly).

This is not an appropriate location for an industrial scale energy facility.

The Noise Impact Assessment still has redacted information due to "Commercial Sensitivity;" however, the calculations have been completed. How can the accuracy of the noise levels and mitigation strategies be quantified without transparency for the EHO to review?

In addition, many manufacturers do not have an issue showing their products noise emissions on their technical data sheets, so why should this be allowed on this application as it comes across as evasive.

It is also noted that this isn't the only document that has redacted information. In the summer application, the Ecological Impact Assessment had redactions on areas covering great crested newts, bat roosting, ecological importance and potential effects on bats, and commuting and foraging bats. From reading document 2025_1689-Officer-Information, the contained e-mail conversation details that the latest ecological impact assessment still has redacted information pertaining to badger setts. Field also submitted an unredacted ecological impact assessment, but asked that this only be sent to the Ecology Officer, and not be placed on the planning

7. Cable Route – Major Unassessed Disruption

The applicant has not provided a defined cable route to the proposed National Grid Substation on Frith Way nor have they formal G98/99 DNO consent to do so. They indicate it may "follow the road corridor," which would require trenching through Market Lane, Frith Way, Carr Lane, Frosts Lane. These are narrow rural lanes lined with homes, businesses, farms, and Grade I & II listed buildings. No assessment of disruption, access restrictions, noise, or heritage harm has been provided.

In the earlier planning application submission, the suggested cable route didn't follow the road network, but this was proposed to go across the fields – following a direct route.

What is the current proposal for the cable route which is another detail missing.

Conclusion:

For all the reasons above, we respectfully request that South Norfolk Council refuse this application.

Non Planning Materials

8. House sales

There is currently a trouble that due to the Solar Applications are struggling to sell their houses as people are concerned of the local area.

i.e. Wacton and Great Moulton

9. BT poles on Stratton Road Wacton

With the proposed widening of the roads to accept the large dangerous lorries we would like you to note that the main road carries all the BT poles for Wacton Parishioners phone lines and Internet and we feel that with the proposals that these would have to be moved which would result in parishioners losing a vital resource for their homes whilst this is done.

Giga clear fibre optic cables are strung along that route, and they also provide access to fibre broadband in Great Moulton. (There are two fibre providers in Great Moulton – Giga clear and County Broadband – and the telegraph pole outside my house has two sets of separate fibre cables and connection boxes adorning it.)

BT poles, as key components of telecommunications infrastructure, are heavily protected by UK law when affected by highways development, primarily through **Permitted Development rights** and the **Electronic Communications Code (Conditions and Restrictions) Regulations 2003**. While they can often be installed or moved with minimal local planning oversight, their relocation or protection during roadworks is governed by strict statutory procedures.

We feel that also BT are not a statutory body for this planning application that they should be consulted regarding how the poles would be moved and service continues if the planning application were to go ahead. As such Giga clear and County Broadband should be included in the statutory undertaking to remove / alter the fibre connections as well as BT

We have tried to list out objections under the planning law and realise that the last two points are no material planning concerns but are for our parishioners and hope you will take these into consideration when this planning application is discussed.