

The applicant's Environmental Statement fails to meet the legal standards required under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and is one of the reasons for my disagreement with the application.

In particular, for glint and glare, the applicant has failed to assess the impact on sensitive receptors at varying receptor heights, including residents who will overlook multiple fields full of solar panels from first floor and/or second floor windows. This is a critical omission that will result in harm to the public and breaches Environmental Impact Assessment (EIA) Regulations.

Mitigation must be intentional, designed and proportionate. However, no such intentional or proportionate mitigation has yet been proposed for the upper floors of dwellings despite their elevated exposure.

Similarly, the applicant's noise assessment is equally insufficient. Outdoor operational noise has not been modelled and the model used for predicted noise levels fails to include second floor bedrooms within roof spaces. Bedrooms within the roof are more acoustically vulnerable compared to lower floors. This is due to the use of thinner construction materials within the roof compared to lower floors and their increased exposure to external noise sources as a result from their elevated position and absence of buffering which would lower the impact. Omitting these rooms is another failure to assess worst case scenarios as required by EIA regulations.

Continuing on, the assessment assumes partially open windows for internal noise predictions. In warmer months residents often fully open windows so the assessment is certainly understating the impact and the harm that will be caused to residents and their pets.

Noticeably, the applicant's report does not specify the assumed sound insulation performance of building façades so the model lacks transparency and potentially further understates internal noise levels.

Tonal correction is deemed as unnecessary by applicant as they have relied solely on manufacturer data rather than assessment of perceptibility at receptors which is procedurally flawed. If tonal features are present, this is likely to materially alter some of the impact classifications.

Legal requirements of the EIA Regulations and the technical standards set by BS 8233:2014, WHO guidelines and Planning Practice Guidance (Noise) are not being met in the applicant's Environmental Statement. The omission of elevated receptors, outdoor operational noise modelling, realistic worst case scenarios and façade performance assumptions renders the assessments incomplete. As a result, the Environmental Statement omits significant harm that will be caused to the public and animals.

The current Outline Battery Storage Safety Management Plan fails to safeguard the public, animals and wildlife as there is no current plan for the events of a battery fire lasting multiple days or reigniting. Also, there is no current plan for the event of flooding compromising firefighting access. Additionally, the reliance on remotely managing and operating the BESS could lead to delays in implementing the safety plan and, as the BESS will be very close to villages and is situated in Flood Zone 3 in current plans, the consequences could be catastrophic. This is another reason for my disagreement with the application.

Overall, the health and safety of the public, animals and wildlife is not being safeguarded by the applicant and is the ultimate reason for my disagreement with this application.