

Submission ID: SC3EB5389

[David Fine IPR [REDACTED] Dunston Hall Annex C.pdf] attached is in two parts.
The first half I'd like to speak to; the second just written.

I'd like to thank the Inspectorate for a clear summary letter and annexes.

Summary:

Four sections;

First two, Safety and Consultation, I wish to speak to;

Third, The Semantics of Safety, just in writing

Fourth, a site-visit offer to the Planning Inspectorate and applicant

Safety

The Inspectorate may take a view to consider within Annex C 'Community, health and well being' that '*Battery energy storage system (BESS) safety provisions and implications*' is better placed under a separate section 'Safety.'

This is because these implications are universal. They apply to all such schemes, be they adjacent to South Molton, Devon; Moulton, Texas or indeed anywhere in the world. 'Community, health and well-being' refers just to that community, namely the South Norfolk Claylands. The implications of these safety issues are generic, not merely specific.

There is also the danger that within the same basket of eggs, neither set of issues will be addressed adequately, or that one dominates the other. Furthermore, the experts involved in the safety or otherwise of battery energy storage systems are totally separate from the other issues in the community, health and well-being section.

To summarise: in the Inspectorate's eyes these safety issues must be serious enough to warrant inclusion, and as they are not specific to the Claylands, both merit and require a separate discrete section.

Consultation

We only heard about East Pye Solar because my wife picked it up on local facebook this May – the size of it left her in tears; its dangers leaves me fuming.

The reason it was so late in the day is because, to quote from South Norfolk District Council's earlier submission:-

'Therefore, on the information provided by the applicant, it appears that the full statutory consultation documents were not sent to Pulham Market Parish

Council or Framingham Earl Parish Council. Statutory consultees should not have to go out of their way to find documents, correspondence and websites and then take the initiative to provide responses on this material when they have not been asked to do so. In view of the above South Norfolk District Council cannot see how the additional statutory consultee identified by the applicant have been properly consulted as required by section 42. The Council consider that the secretary of state must take steps to confirm whether or not the applicant has complied with section 42 before accepting the application for examination.

Conclusion

‘For the reasons set out above the statutory consultation undertaken by the applicant has fallen short of what South Norfolk Council would expect to see on a project of this scale and nature. The Planning Inspectorate, on behalf of the secretary of state, will need to consider carefully whether to “accept” the application or whether further steps are required to overcome the non-compliance identified.’ [Examination Library AoC-007 February 2023]

Well, were further steps taken? The lack of public consultation has meant we’ve no true opportunity to become involved a year-and-a-half ago, and others may surely feel the same, if they are even aware of East Pye Solar – you wouldn’t be reading had these duties been fulfilled.

It seems only fair, right and proper that space and time is made by the Inspectors to rectify the error. It’s just question of how long. If Island Green Power got their skates on, two-three months should do it, and a couple of weeks to wrap up the results for further action. (Because of earlier negligence I’m working to the same deadline too.)

Never mind externally imposed time constraints does the Planning Inspectorate disagree?

The above I would intend to speak at Dunston. I’ve timed it at under five minutes.

The below is just additional written material and finally a offer to the Inspectorate,

The Semantics of Safety

There is a semantic point which by no means is mere semantics...

BESS refers to a battery energy storage system, like our tv remote with two AAA lead-nickels to energise our tv before we fall asleep in front of it. They are hardly likely to

catch fire while we're asleep. Rechargeable lithium-ion batteries do carry that risk, since otherwise it would not be set as a separate safety issue by the Planning Inspectorate to interrogate. This accords to the International Organization for Standardization (ISO or worldwide federation of national standards bodies) decision in January 2026 to revise their ISO 3941 to include rechargeable lithium-ion batteries as a separate Category L for fire hazards.

Apart from being inexact to the point of laxness, the phrase 'BESS' softens those hazards and their dangers so its users may lessen or already have lessened their awareness. I make no apologies for seeming to be pedantic. To concatenate our tv remote control with the Great Moulton installation is tantamount to saying my bike and a moon rocket are travel systems, and therefore similar.

To keep our critical faculties fully aware a short-hand phrase such as LiBs¹ used in the briefing note already held by the Inspectorate from February 2025 may be preferred in any dialogue, verbal or written.

[n.b. LiBs could be pronounced 'li-bees' which stresses both lithium and battery, which is far less clumsy than BESS-s for more than one BESS. It's also lexicographically more acute, like sheep or aircraft, the same word for singular and plural – a flock of sheep or fleet of aircraft. An array of li-bees, maybe?]

Site Visits

As a landscape archaeologist I'd be delighted to oblige to help show how the South Norfolk Claylands work, and have kept the diary clear for the week starting 16th November.

Were this offer taken up, lest the weather meant we had to stay indoors and for the record, I will prepare a powerpoint comprising photographs, maps etc. rather than bullet-points as slides, and notes as explanatory captions, which is the standard way archaeologists and other landscape academics and professionals present to audiences. I will also produce a .pdf for those who do not use Microsoft Powerpoint.

¹ https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010170-000793-SGHS.BESS.2_Briefing_Note_BESS.pdf