

WRITTEN SUMMARY OF REPRESENTATION

East Pye Solar – EN0110014

BATTERY ENERGY STORAGE SYSTEM, PROJECT SUBSTATION AND ASSOCIATED SITE 1 GRID INFRASTRUCTURE

Submitted on behalf of BEPS – Great Moulton

This representation concerns the proposed Battery Energy Storage System (“BESS”), Project Substation and associated Site 1/National Grid infrastructure between Great Moulton and The Tivetshalls.

The central issue is not that East Pye has undertaken no assessment. It has submitted a substantial Environmental Statement, plans, technical appendices and outline management documents. The issue is whether those documents provide a sufficiently clear, site-specific and enforceable case for this concentration of BESS and grid infrastructure.

The Examining Authority is respectfully requested to consider the development as it would be experienced locally: as one western infrastructure cluster comprising the BESS, Project Substation, National Grid Substation, grid connection works, overhead-line and pylon works, access, drainage, security infrastructure and mitigation, rather than as isolated components.

1. Need, Deliverability and Alternatives

East Pye should demonstrate the specific need and deliverability case for the BESS as distinct from the solar generating station.

BEPS submits that the BESS should not simply inherit the general national policy need for solar generation. East Pye should identify which planning benefits depend specifically upon the BESS and demonstrate that those benefits are sufficiently certain to be given weight.

There is also no sufficiently transparent BESS-specific alternatives appraisal. Grid proximity and co-location may provide engineering advantages, but they do not themselves establish that this is the least harmful or most appropriate location. East Pye should provide a criteria-led comparison of reasonable locations and configurations, including a smaller BESS, alternative BESS location, solar-only option and, where reasonable, off-site or network storage.

2. Definition of the Development and Design Certainty

The Applicant’s documents are not consistently clear about the spatial relationship between the approximately **22.90 ha BESS Site**, Work No. 2, Sub-Site 1B, the Project Substation and the National Grid Substation. East Pye should provide one definitive

coordinated plan and schedule reconciling the Works Plans, Land Plans, Environmental Statement, Design Approach Document and draft DCO.

Significant matters remain for detailed design, including final battery technology and chemistry, enclosure numbers and arrangement, cooling, fire suppression, final plant locations, acoustic mitigation, firewater design and aspects of the Project Substation configuration.

A Rochdale Envelope can provide legitimate flexibility, but only where every material choice is bounded by an assessed worst case and enforceable DCO controls.

East Pye should therefore identify the maximum development capable of being built, the assessment assumption controlling each deferred design choice, the approval mechanism, and how compliance will be verified. Later design should not be permitted to create materially different or greater effects than those examined.

3. BESS Safety, Firewater and Emergency Response

The Outline Battery Safety Management Plan addresses thermal runaway, fire, explosion, toxic-gas release, emergency access and contaminated firefighting water, but it is based on a concept design rather than final equipment.

BEPS does not assert that toxic exposure to residents is a predicted effect. The concern is whether the final battery system will remain no worse than the system assessed. East Pye should demonstrate, using final equipment information and appropriate testing and consequence modelling, that battery chemistry, spacing, enclosure design and fire behaviour remain within the examined safety envelope.

The final emergency strategy should secure adequate appliance access and turning, firefighting-water availability, drainage isolation, contaminated-firewater containment, incident command, public-route management, post-incident monitoring and environmental remediation.

4. Groundwater and Private Water Supplies

East Pye identifies **29 private water supplies or permitted abstractions within 1 km** of the BESS and substation area, **19 potentially active**, and acknowledges uncertainty in some underlying records. The Applicant also proposes post-consent intrusive investigation and Foundation Works Risk Assessment where deep foundations or piling may create groundwater pathways.

The Environment Agency has identified the need to address potential contaminant pathways associated with foundation design. East Pye should therefore demonstrate that no relevant deep or piled foundation works can proceed until the necessary investigation, hydrogeological assessment and mitigation have been completed and approved.

The BESS drainage and firewater strategy should be integrated with groundwater protection. Where a credible pathway to a private supply cannot be excluded, East Pye should secure proportionate baseline monitoring, follow-up monitoring, incident response and remediation.

5. Noise and the Very Quiet Rural Environment

Operational noise is a major local issue because the BESS, transformers, inverters, cooling equipment and substations would operate within a very quiet rural soundscape, with periods recorded below **25 dB**.

The assessment relies on example plant and an indicative layout because final equipment has not been selected. The independent Oakridge review identifies uncertainty concerning plant numbers, source data, low-frequency propagation, tonality, barrier performance and assumptions about masking during quiet night-time conditions.

The issue is not that unacceptable noise has already been proven. It is that East Pye should demonstrate that it can be ruled out for the final plant.

A final cumulative acoustic assessment should use the selected equipment and layout, apply appropriate **BS 4142 acoustic-character corrections**, demonstrate performance during the quietest relevant periods and secure post-commissioning verification and corrective action. The retained National Grid Substation should also be included in the long-term acoustic position where it remains after BESS decommissioning.

6. Landscape, Ecology, Agricultural Land and Rural Character

The BESS/Site 1 locality is open plateau farmland with expansive skies, long views, quiet lanes, PRoWs, hedgerows, mature trees, historic buildings and a relatively tranquil, dark rural character. East Pye's own assessment identifies significant adverse landscape and visual effects in this area.

Planting may reduce some views over time, but it does not remove the infrastructure or the intervening years of effect, and may itself change the open plateau character. East Pye should provide receptor-specific assessment of the combined BESS, Project Substation, National Grid and associated works at construction, opening, later mitigation stages and after solar/BESS decommissioning.

Ecologically, East Pye has undertaken substantial Scheme-wide surveys, but the BESS/Site 1 hard-infrastructure area requires a clear local schedule showing habitat loss, ponds and buffers, bat dark corridors, breeding-bird impacts, hedgerows, movement routes, fencing, drainage, lighting, licensing dependencies and BNG compensation.

The BESS area is described as essentially **Grade 2 Best and Most Versatile agricultural land**. East Pye should quantify permanent and temporary BMV loss for the

BESS and substations and distinguish land genuinely capable of restoration from land affected by retained infrastructure, foundations, access or drainage.

7. Access, PRowS and Hundred Lane/RB19

East Pye should provide one final access and PRow plan distinguishing construction, operational, emergency and permanent maintenance routes.

Of particular concern is the proposed crossing of **Hundred Lane/RB19**, a historic rural route, which is described as both a construction haul crossing and permanent maintenance access.

East Pye should identify the assets the crossing serves, explain why earlier access arrangements are insufficient, provide its design and expected use, state whether it remains after decommissioning, and explain how the permanent change entered the design and consultation process.

8. Cumulative Effects, Permanence and Post-Year-60 Position

The BESS Site is a cumulative impact focal point. Residents and environmental receptors may experience construction traffic, noise, lighting, visual change, PRow disruption, drainage risk and ecological disturbance together.

East Pye should provide receptor-based cumulative schedules and a realistic combined construction programme rather than leaving the ExA to reconstruct interactions across separate chapters.

The distinction between time-limited and permanent infrastructure is also fundamental. The solar/BESS development is described as having an approximately **60-year operational period**, whereas the **National Grid Substation and Grid Connection Infrastructure are described as remaining**.

East Pye and NGET should therefore identify which access, drainage, landscaping, noise sources and mitigation remain after Year 60 and who is responsible for them.

9. Conclusion and Examination Request

BEPS respectfully asks the Examining Authority to require East Pye, and NGET where relevant, to demonstrate the final proposition for which consent and land powers are sought.

This should include:

- a transparent BESS need and alternatives case;
- a definitive spatial description of the BESS/Site 1/National Grid cluster;
- fixed environmental and safety limits for material deferred design choices;
- coordinated fire, drainage, groundwater, private-water, noise, ecology, landscape, transport and agricultural-land controls;

- receptor-based cumulative assessment;
- clear responsibility for retained National Grid infrastructure and the post-Year-60 position; and
- clear DCO mechanisms for approval, monitoring, verification and corrective action.

Local residents should not be required to design the Scheme, reconstruct the Applicant's case from dispersed documents, or prove that an alternative would work before East Pye has demonstrated why its chosen development is justified.

Where acceptability depends upon an indicative layout, future management plan, deferred assessment or later mitigation, **East Pye should identify the assessed worst case, the binding control that secures it, the responsible body and the means by which compliance will be monitored and enforced.**

Where material uncertainty remains, that uncertainty should remain with the Applicant rather than being assumed away.