
From:
Sent: 27 March 2024 22:23
To: Planning Comments (SMDC)
Subject: Comment Received from Public Access

Categories:

Application Reference No. : SMD/2024/0055 Site Address: LAND SOUTH OF CELLARHEAD SUBSTATION AND WEST OF Rownall Road Wetley Rocks Staffordshire Comments by: Stuart Smith

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Submission: Objection

Comments: I object to this planning proposal.

Noise represents a chief concern for the BESS industry and the communities used to house these systems. Prolonged exposure is not only disruptive, but detrimental to human health.

Section 2.1 of the National Planning Policy Framework specifically states that ‘Planning policy and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development’. Though the application states a nil effect at close residences this conclusion should be questioned and investigated further by technically competent representatives of the council planning committee.

Sound generated by each battery storage container is stated as 88dB(A) a figure referred to as being between standing 50ft. away from a diesel truck running at 40mph and a propellor plane flyover at 1000ft. (Source: Architectural Acoustics, M. David Egan, 1988, and Architectural Graphic Standards, Ramsey and Sleeper, 1994).

There is no mention within the application confirming what the expected sound output will be for the combined system. All quoted dB(A) figures are for singular items. Increasing the intensity of sources (248 No.) most certainly means that an increase in dB(A) would be expected.

The proposal predicts that installation of a 4m high 0.1m deep wooden ‘acoustic’ fence and a 7m high ‘planted bund’ will reduce noise to within or indeed below the existing ambient noise conditions, measured as 35 dB(A) and 25 dB(A) daytime and night time respectively. It is hard to give credit to this prediction when the application itself states that ‘the detailed engineering of which is still to be determined’. How is it possible to model acoustic reduction without any form of engineering design?

A 7m high bund in itself will have a significant visual impact on the greenbelt landscape. It would be remiss of the planning committee to approve the application in the absence of any detail of this important feature.

One section of the perimeter (namely the route of existing overhead power lines) has no planted bund yet the Acoustic Design Specification does not seem to predict that this will cause any increase in noise emissions within this specific area. Or this is intentionally left out of any analysis?

A significant portion of noise pollution within a BESS is attributed to the heating, ventilation and air conditioning system (HVAC) that is required in order to maintain specific operating conditions for the batteries themselves. In consulting similar Acoustic reports, it is often this system that causes the highest level of noise pollution yet there is no mention of any such system within the application or design drawings of the battery containers.

It is presumed that similar or the same product(s) have been developed by the manufacturer and have been subjected to actual noise testing. I would urge the committee to request further information from the applicant and manufacturer around how this test was completed and indeed witnessed/evidenced.

Given the above, it is the planning committees duty to ensure thorough and independent verification of technical content within the Acoustic Design Specification. Furthermore, adherence to the stated noise levels should be an absolute condition of any potential approvals and subject to post construction inspections.

There is significant emphasis within the application regarding both the amount of CO2 emissions being saved and the quantity of homes that the BESS will supply renewable power to. I would draw attention to the following:-

1. It is well known that in order to preserve battery life it is sub optimal to charge to 100% and discharge to 0% of the battery's total capacity. Having researched similar system designs it seems common to follow a strategy of 10% - 90% thus reducing overall capacity by 20%. In the absence of any detail regarding such strategy within the application it would be fair to assume that the 40MW capacity would in effect be 32MW.
2. The annual outputs stated within Appendix 2 suggests that there is surplus electricity within the grid 365 days per year. Considering the national grid functions based on supply and demand this expectation should be verified given the impact on overall CO2 and household quantity calculations. Does the national grid publish loss of surplus electrical energy or is it possible to investigate this further?
3. It is expected that over time oxidation within a lithium-ion battery causes inefficiencies and reduced capacity. The calculations within appendix 2 seem to suggest that this is not the case. There is no information within the application regarding life expectancy of the batteries.

4. The calculation for CO2 emissions within Appendix 2 of the planning application assumes that all energy stored has been produced by renewable means ¿ does this mean that any surplus coal or gas generated electricity will be disregarded and therefore we can confirm that carbon savings are best case scenario for the entire forty-year lifespan?

Taking point 1 above and applying it to the applicants methodology would yield a very different result:-

- 297,840 MWh annual supply
- 11,913,600 MWh lifetime supply
- 2,466,115 tonnes CO2e saved
- 4,412,444 annual household demand met

A possible over estimation by more than one million households is not a trivial matter when considering the application. The entire narrative of the application is through ¿rose tinted glasses¿ and seems to be based on best case scenario at all times. I suspect that if we take points 2,3 & 4 above we would see further reductions. Again, I urge the planning committee to seek independent technical advice on the content of all reports that have been provided to the applicant for monetary gain.

Finally, I would like to draw attention to a statement made within the application whereby when questioned whether or not the applicant is related to an elected member. The answer ticked is ¿NO¿. The majority shareholding director of S&C Energy Ltd. Is Carl Pointon, Father of Oliver Pointon who is an elected member of Staffordshire Moorlands District Council. This blatant disregard of ensuring a fair and impartial application should be investigated immediately.

In summary, purchasing of this land was carried out with the sole purpose of profiteering from development of the greenbelt. There is no accompanying renewable energy source that compliments the installation of a battery storage system. This is a clear buy cheap sell expensive profit making scheme at the expense of the greenbelt and the local community that surrounds this area.

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