



Town and Country Planning Act 1990 - Section 78 Appeal

Rookery Farm Granborough Buckinghamshire

Development of a battery energy storage system (BESS) connected directly to the National Grid with associated infrastructure including access, drainage, and landscaping.

Application reference 23/03875/APP. Appeal reference 25/00013/REF

Comments by Granborough Parish Council

Please note to avoid any confusion following the LPA's erroneous description in the initial report to the Buckinghamshire Council's Planning Committee the site which is subject to the appeal lies solely within the Granborough Parish area, land identified for the temporary construction access and for the underground cable to connect to the existing East Claydon Substation lie within the East Claydon Parish Council area, as does the site proposed by Statkraft referred to in this response.

Granborough Parish Council first considered the application at its meeting held on 16th January 2023. Prior to the meeting the Parish Council held a public forum to listen and understand any concerns of residents and delivered a questionnaire to every dwelling in the village. At the Parish Council meeting there was a further opportunity for the public to speak on this matter and 5 residents made comments. It was reported that 272 questionnaire responses were received, representing approximately 50% of the total village population. 230 (85%) were against the application, and 42 (15%) were in favour of the application or were undecided. The Parish Council considered the planning application in the context of material planning consideration and the following:

- The National Planning Policy Framework 20 December 2023 commonly abbreviated to the NPPF,
- The Vale of Aylesbury Local Plan (VALP) adopted by the Council in 2021, and
- The Granborough Neighbourhood Plan 2022. (GNP)

The following was agreed: **To object to the planning application on the following grounds.**

The full response containing the grounds of objection and including suggested conditions pertinent at that time is set out in **Appendix 1**

1. Following the applicant's submission of revised proposal the Parish Council (GPC) formally met to consider the amendments to the planning application on 3rd September 2024. The following was agreed.

To object to the planning application on the following grounds:

The full response containing the grounds of objection and including suggested conditions pertinent at that time is set out in **Appendix 2.**

2. **Granborough Parish council still considers all those objections relevant but recognises that some of the suggested conditions have been (at least partly) met in subsequent documents from Statara. However, in terms of our previous comments**

in respect of suggested conditions if planning permission is granted GPC still feels that the comments are still relevant and would respectfully ask that the Inspector takes these into account should the appeal be allowed.

3. These responses, along with numerous others opposing the proposal were considered by the Buckinghamshire Council Planning Services, and were in the main rejected in the conclusions to the Officer's recommendation report for approval, The Buckinghamshire Council Strategic Sites Planning Committee however chose to refuse the application and agreed the following in the refusal as set out in the decision notice issued on 20th December as follows: -

The proposal which is a large-scale energy development will be introduced into a strongly agricultural landscape and would be significantly incongruous. It will have, despite the proposed mitigation, significant adverse impact on visual amenity and on landscape character at the site, local and landscape area levels. Furthermore. The cumulative effects of the proposal with Tuckey Farm (consented permission) and the existing East Claydon Sub Station would lead to cumulative visual and landscape character effects which would be significantly adverse Together this would change the existing predominantly pastoral landscape to one defined by energy development.

The proposal is contrary to Policy C3, BE2 and NE4 of the Vale of Aylesbury Local Plan (VALP) 2021 and RC2 and RC3 of the Granborough Neighbourhood Plan (GNP) 2022 and paragraph 187 of the NPPF 2024

GPC considers that whilst the Planning Committee decided not to agree with the overall recommendation of approval by officers, significant regard should be taken of the comments by the Buckinghamshire Council's own Landscape Officer. The officer provided comments on the application stating that it would have "a significant adverse impact on landscape character for the site and the local landscape area, stating that the introduction of the development would be "significantly incongruous" Although Statera made some amendments following this the Landscape Officer maintained the objection to the application, however this was not reflected in the officer recommendation to the Committee which considers that it was inevitable that given the nature of the application it will result in a change to the baseline from agricultural fields to energy structure and hence attributed negative weight in the planning balance.

The Buckinghamshire Council's Landscape Officer's view was fully in line with the views of the GPC, local residents and neighbouring PCs.

GPC considered the application's refusal and the subsequent appeal at its meeting held on 18th April 2025 and considered that.

- 1 In respect of the cumulative impact of local proposals, whilst the inclusion of the permitted Tuckey Farm development was seen as a crucial part of the refusal, other known proposals were not seen as being developed to a stage where they may be subject of inclusion when considering cumulative impact, **this is no longer the case as the proposals for the following are now at a much more advanced stage and subject to public consultation.**
 - A) **The Rosefield Development** adjacent to the Statera site (in East Claydon PC's area) a massive solar farm of some 279 hectares plus proposals for a BESS. This proposal is being considered as a Nationally Significant Infrastructure Project (NSIP). This proposal in isolation is of such a scale as to drastically and irrevocably

change the character of this part of Buckinghamshire and must be now considered as relevant when assessing cumulative impact.

B) The proposal by **Statkraft for the East Claydon Greener Park** adjacent to the Statera and Rosefield sites where an Environmental Impact Assessment Screening request has been submitted to Buckinghamshire Council, and public consultation has commenced. This is for a BESS potentially of 500MW (i.e. same storage capacity as the Statera Application) plus a system of “Synchronous Compensators” which to quote Statkraft are “**large electrical machines with flywheels which can replace the spinning turbines of a traditional power station but without emitting any carbon dioxide**”. This proposal is therefore one requiring mechanical electricity generation and again irrevocably changes the character of this part of Buckinghamshire and must be now considered as relevant when assessing cumulative impact.

C) The proposal by the National Grid (NG) for a new East Claydon Substation

1. The NG has publicly stated that the East Claydon Substation (ECS) which was built in the 1960's is coming towards the end of its useful life, and that it does not have sufficient electrical capacity to connect new customers to their transmission network. Furthermore, they have stated that the replacement substation needs to be located near to their customers and will help to reduce the amount of infrastructure required including overhead lines.
2. The NG has also stated that the replacement needs to be located close to the existing ECS, hence they have identified the preferred site as being immediately to the west of the existing ECS and nearer to East Claydon village.
3. The NG has not yet provided details of the new substation however the indicative footprint is similar if not larger, to that of the existing ECS. Clearly this new structure will be highly visible from many locations and will impact on the visual appearance of the area when set alongside other proposals and especially for the period immediately after construction and awaiting commissioning when the old ECS would still be present awaiting decommissioning and demolition.
4. The NG has already held several consultation meetings and are proposing consultation during 2025 with a planning application submitted to Buckinghamshire Council in 2025.

D) Proposals by NOVENTUM POWER for the Longbreach Solar Farm off Marston Road

1. This proposal is for a solar farm only (i.e. does not include any battery storage facilities) located just to the south of Granborough off the road to North Marston, the site is often referred to locally as “Wings Farm”. The site lies partly in the GPC area and partly in North Marston PC, the site is closer to Granborough Village, than N. Marston Village.
2. The proposal is for a 49.9MW renewable energy project with a solar farm capable of developing enough green energy for around 20500 homes.
3. The scheme would lead to the loss of a large area of open farmland used for grazing and will be very visible from several viewpoints in Granborough.

4. Noventum Power has completed its initial surveys and public consultation exercise and plans to submit a planning application to Buckinghamshire Council later this year.
5. If approved this will be another significant adverse impact on landscape character of the site and the local landscape area.

Other matters

Fire safety

1. The concerns regarding fire safety were raised in all the objections submitted by GP to Buckinghamshire Council, as well as by the public and neighbouring Parish Councils.
2. This was not however considered of significance by the Planning Officers nor was it included in the grounds for refusal agreed by the committee. However, GPC would like to make it abundantly clear that this matter is of considerable concern to the Parish Councils and to local residents. This concern is multiplied many times by the possibility of the following potential sites containing BESS installations in addition to the Statera Site, namely.
 - Rosefield Solar Farm and BESS
 - Statkraft - East Claydon Greener Park

This is another factor in the concerns regarding the cumulative impact of these now further developed proposals.

3. GPC is aware of around 70 fires which have occurred between 2018 and 2023 worldwide and more recently in 2025 the fire at a BESS under construction at Tilbury Essex which was under construction for Statera. It is recognised that not all BESS's are the same, with the UK models being largely separate containers in the open air and others including the worst recorded fire at Moss Landing in the USA where the BESS has been installed inside an existing structure effectively turning the building into one large container. Whilst the overall number of fires may appear low this must be viewed in the context of there being relatively few BESS plants at this time but with many more in the pipeline.
4. Over the planned 40-year life of the proposal with the lithium-ion batteries a fire is a high probability. The current best practice in layman's terms is to let the fire in a container burn itself out but to prevent spread to others by cooling. During this burn out period (thermal runaway) There is the potential for the release of harmful gases with alleged explosive risks. Fire safety guidance for grid scale BESS is in our opinion still largely in its infancy and there are many calls for more stringent regulation. Whilst Statera's current design shows separation between units, fire protection and access for firefighting, such measures may not be considered sufficient by the time construction commences. **GPC therefore considers that should the appeal be allowed then it should be conditioned requiring that the location, placement and separation of the containers, the fire protection, mitigation, and access for firefighting is compliant with best practice guidance (or any statutory requirements from the HSE or other body) relevant at the time of construction.**

Granborough Parish Council May 2025

APPENDIX 1

1.Excessive scale of the development: The proposed development in terms of its overall size and scale is excessive in this rural area having regard to various reports including: 1. The National Grid 'Energy Scenario' report 2022 showing a need for 20,000 MW battery storage by 2030 and 35,000 MW battery storage by 2050, and The 'Renewable UK' energy report showing that 31,500 MW battery storage has already been consented with 27,400 MW in planning and 25,400 MW not yet submitted, which indicates that the East Claydon BESS site is not required to meet national targets and that there is no need for a BESS of this scale.

2.Environmental impact: The proposed development in terms of its overall size and scale is excessive in this rural area having regard to the environment, including the impact on existing wildlife, ecology, and biodiversity. It is not considered that the proposed mitigation measures outweigh any stated benefits. In addition, any fire within the site will have an adverse impact on the local environment due to the toxicity from fumes as well as polluting the ground and water courses from contaminated water used to extinguish a fire.

3.Effect on the existing landscape including visual intrusion: The proposed development in terms of its overall size and scale including the 'customer substation fire walls' is excessive and incongruous in this rural area having regard to the existing landscape and topography of the site thereby having an adverse impact when viewed from the higher ground in Granborough and East Claydon and from the immediate vicinity, including public footpaths.

4.Fire safety: The nature of the development presents a considerable fire risk and fear of fire. It has not been demonstrated that there will be adequate mitigation measures to control.

- thermal runaway
- the release of toxic fumes
- prevention of pollution on the surrounding land and water courses
- suitable permanent fire access to the equipment.

5.Inappropriate location: It has not been adequately demonstrated that there is an imperative need for this to be sited in this rural location on open farmland and it has not been further demonstrated that other suitable sites, including previously developed (brownfield sites), have been extensively investigated and considered as an alternative and more appropriate location for this type of development.

6.Cumulative impact: The cumulative effect of the development and other nearby proposals will take up over 1000 hectares of existing farmland which will have an adverse effect on the rural character of the area as well as taking out valuable land for food production having regard to:

1. the current proposal an extant planning consent for a solar farm at Tuckey Farm on the northern boundary of Granborough (Bucks Council Planning reference 19/00983/APP)
2. a proposal for a solar farm at Wings Farm (Bucks Council Planning reference 23/01939/SO), and
3. proposed development for a solar farm and battery storage known locally as The Rosefield development (The Planning Inspectorate reference EN010158).

7.Noise: There has not been an adequate noise assessment of the proposal in relation to the potential impact on the users of the adjacent footpaths.

Suggested Conditions

That if Buckinghamshire Council as the Local Planning Authority determining this planning application decide to approve the application, then planning conditions should be imposed covering the following matters:

- a. Highways and traffic – only always using the proposed haul route except for the 4 abnormal indivisible loads (AILs) as referred to in the planning application,
 - b. No increase in height of the buildings/structures above that shown on the existing application,
 - c. Landscape improvement to be undertaken in advance of the development and to include mature planting,
 - d. Restriction on working hours and not to allow working on any weekends and bank holidays,
 - e. Controls on lighting during construction and operation of the site,
 - f. Controls on noise levels from generators during construction and when the site is operational,
 - g. Vehicles to be able to turn within the site to allow forward movement and to avoid reversing,
 - h. Wheel wash facilities to be provided before development commences and operated during the entire construction period,
 - i. independent verification of the Fire Controls,
 - j. Details of the restoration of the site to be submitted, agreed and carried out in accordance with approved details,
 - k. Audited details for the maintenance /funding/management of green and planted areas to be submitted and approved. In the context of j and k above it is suggested that these may be covered by a formal section 106 legal agreement between Buckinghamshire Council and the applicant.
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Appendix 2

1. Excessive scale of the development. The proposed development in terms of its overall size and scale is excessive in this rural area having regard to various reports including:
 - i) The National Grid 'Energy Scenario' report 2022 showing a need for 20,000 MW battery storage by 2030 and 35,000 MW battery storage by 2050, and
 - ii). The 'Renewable UK' energy report showing that 31,500 MW battery storage has already been consented with 27,400 MW in planning and 25,400 MW not yet submitted, which indicates that the East Claydon BESS site is not required to meet national targets and that there is no need for a BESS of this scale.
2. Environmental impact. The proposed development in terms of its overall size and scale is excessive in this rural area having regard to the environment, including the impact on existing wildlife, ecology, and biodiversity. It is not considered that the proposed mitigation measures outweigh any stated benefits. In addition, any fire within the site will have an adverse impact on the local environment due to the toxicity from fumes as well as polluting the ground and water courses from contaminated water used to extinguish a fire.
3. Effect on the existing landscape including visual intrusion. The proposed development in terms of its overall size and scale including the 'customer substation fire walls' is excessive and incongruous in this rural area having regard to the existing landscape and topography of the site thereby having an adverse impact when viewed from the higher ground in Granborough and East Claydon and from the immediate vicinity, including public footpaths. Whilst the GPC notes the amendments to the application reduces the area of the BESS and the number of battery storage units, the Parish Council does not consider this to remove the severe visual impact of the proposal on the local environment. Whilst GPC understands why the sedum roofs have been considered unacceptable by the Fire Authority their removal will result in the storage units being more highly visible, and in addition the increased size of the inverter buildings will make the whole complex intrude more on the existing landscape from a visual impact. In addition, the GPC cannot accept the view put forward by Statera that the reduction to one field means that the existing electricity substation is the dominant structure when it is fully aware that the existing substation is to be replaced by a new structure, the exact design of which is as yet unknown and will be sited at a greater distance from the proposed BESS, with potentially the BESS being the dominant structure.
4. Fire safety. The nature of the development presents a considerable fire risk and fear of fire. It has not been demonstrated that there will be adequate mitigation measures to control: • thermal runaway • the release of toxic fumes • prevention of pollution on the surrounding land and water courses • suitable permanent fire access to the equipment Until such time as the Emergency Response Plan (ERP) has been submitted and approved by the Fire Authority (and any other relevant authority) GPC considers that this application should not be approved and would not want to see it included in any detailed schedule of matters to be approved by the LPA after any approval in principle is given i.e. it should not be subject to a planning condition as this information should be considered and determined as part of the current application.
5. Inappropriate location. It has not been adequately demonstrated that there is an imperative need for this to be sited in this rural location on open farmland and it has not been further

demonstrated that other suitable sites, including previously developed (brownfield sites), have been extensively investigated and considered as an alternative and more appropriate location for this type of development.

6. Cumulative impact. The cumulative effect of the development and other nearby proposals will take up over 1000 hectares of existing farmland which will have an adverse effect on the rural character of the area as well as taking out valuable land for food production having regard to:
- A). the current proposal an extant planning consent for a solar farm at Tuckey Farm on the northern boundary of Granborough (Bucks Council Planning reference 19/00983/APP)
 - B) a proposal for a solar farm at Wings Farm (Bucks Council Planning reference 23/01939/SO),
 - C) proposed development for a solar farm and battery storage known locally as The Rosefield development (The Planning Inspectorate reference EN010158).
 - D) The proposed replacement of the existing electricity substation by National Grid (full details yet to be published) and,
 - E) The proposed new Greener Grid Park near East Claydon substation for another 500mw BESS located on the East Claydon/Granborough Parish boundary Buckinghamshire Council REF: 24/02556/SO.

The cumulative impact of this BESS and these other proposals will completely change the rural nature of the area for generations to come and therefore will have a significant and detrimental effect on the character of the wider Claydon Valley and Hogshaw Claylands which will not be outweighed by any perceived benefits.

7. Noise. There has not been an adequate noise assessment of the proposal in relation to the potential impact on the users of the adjacent footpaths.

In addition, the Parish Council consider that the following matter should be addressed and considered as part of the decision making on this application:

- i. The Construction Environmental Management Plan (biodiversity) must be supplied and approved,
- ii. The ERP must be supplied and approved,
- iii. The weight capacity of the Haul Road bridges must be clarified,
- iv. A surface water drainage strategy must be submitted,
- v. The quality of the water already on site and of the Brook, should be established prior to any development taking place,
- vi. The yield of the lost fields should be established to accurately measure the loss of agricultural use,
- vii. Public Benefit: Ministers have stated that the National interest will prevail over local veto, but there should be Public Benefit for those affected; this benefit should be established as a condition of this and other large applications going ahead, and
- viii. New Substation: we are told new connections will not be available until 2030. Clarity is required as to when Statera can secure any kind of connection and if it is not actually until 2030, then the Parish Council feel this application is premature,

B. That if Buckinghamshire Council as the Local Planning Authority determining this planning application decide to approve the application, then planning conditions should be imposed covering the following matters:

- a. Highways and traffic – only always using the proposed haul route except for the 4 abnormal indivisible loads (AILs) as referred to in the planning application,
 - b. No increase in height of the buildings/structures above that shown on the existing application,
 - c. Landscape improvement to be undertaken in advance of the development and to include mature planting,
 - d. Restriction on working hours and not to allow working on any weekends and bank holidays,
 - e. Controls on lighting during construction and operation of the site,
 - f. Controls on noise levels from generators during construction and when the site is operational,
 - g. Vehicles to be able to turn within the site to allow forward movement and to avoid reversing,
 - h. Wheel wash facilities to be provided before development commences and operated during the entire construction period,
 - i. independent verification of the Fire Controls,
 - j. Details of the restoration of the site to be submitted, agreed and carried out in accordance with approved details,
 - k. Audited details for the maintenance /funding/management of green and planted areas to be submitted and approved. In the context of j and k above it is suggested that these may be covered by a formal section 106 legal agreement between Buckinghamshire Council and the applicant.
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