

# FRAMFIELD PARISH COUNCIL

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## **Minutes of a Planning Committee Meeting held on Friday, 14 February 2025, at 6 pm in the Village Hall, Blackboys.**

Present: Committee Members: Maria Naylor (Chairman), Trishia Blewitt, Keith Brandon and David Jenner.  
In attendance: Ann Newton (Parish Clerk).  
Public: 13.

*The Parish Clerk opened the meeting, welcomed the members of the public present and explained how the meeting would be run. Councillor Keith Brandon subsequently took the Chair for the meeting. Members of the public spoke against the application.*

### **1. Apologies.**

Councillor Linda Jenner.

### **2. Declarations of Interest.**

*Councillors to give notice of declarations of personal, prejudicial and pecuniary interests in respect of items on the agenda. There were none.*

### **3. Minutes of the Last Meeting/delegated comments for Approval.**

It was agreed that the delegated comments having been circulated, be approved, adopted and signed as a correct record. (TB/MN).

### **4. Planning applications for consideration**

- **WD/2024/2919/MAJ – Construction of a battery energy storage system (BESS) with an output capacity of 600mw along with associated infrastructure and equipment, including fencing, security cameras, cabling, access tracks, transmission and distribution substations, together with associated landscaping, biodiversity enhancement and SUDS provision, and creation of new access track from Sandhill Lane and supplementary secondary access track for emergency use only.**  
**Farmland to the north-west of Sandhill Lane, Halland (approximately 500m north-east of Crockstead Farm, 36m south-east of Palehouse Common, 1.5km north of Halland and 2km south-east from the outskirts of Uckfield).**  
<https://planning.wealden.gov.uk/Planning/Display/WD/2024/2919/MAJ>

Framfield Parish Council wishes to register its strongest objection to the proposed Battery Energy Storage System (BESS) development in our rural countryside. The application presents numerous significant concerns spanning environmental, archaeological, flood risk, landscape impact, safety, and community well-being. We urge Wealden District Council to reject this proposal for the reasons outlined below.

#### **Environmental and Landscape Impact**

The proposed site is located in open countryside, where industrial-scale infrastructure of this nature is entirely inappropriate. The introduction of battery storage units, fencing, and associated structures will have a detrimental impact on the rural character of the landscape, contradicting the Wealden Local Plan's policies that seek to protect the countryside from unsuitable development.

The site is home to a rich variety of flora and fauna, including legally protected species such as the Great Crested Newt. The applicant's own Ecological Impact Assessment has inexplicably redacted key sections (2.14, 3.16, A3.6, Plan 5), raising serious concerns about

transparency and potential biodiversity loss. Furthermore, while mitigation measures propose relocating wildlife, there is no guarantee that displaced species will successfully adapt elsewhere - particularly given the significant environmental disruption already caused by recent infrastructure projects such as the Little Horsted Substation.

Additionally, the 15-metre buffer zone from Ancient Woodland is grossly inadequate. Given the well-documented risk of BESS fires worldwide, any fire at this facility would almost certainly destroy the Ancient Woodland. A more substantial protective zone is essential if such a development were even to be considered, yet the proposal falls far short of this requirement.

### **Flood Risk and Water Contamination**

The site has a significant slope, contrary to the developer's assertion of a "gentle" gradient. Calculations indicate a 10-metre drop from north to south, meaning that water runoff - whether from rainfall, firefighting efforts, or accidental spills—could lead to severe water displacement. This poses a direct risk to the tributary of the River Ouse and Ridgewood Stream.

The claim that at the lower end of the site a 5-metre topographical difference is suitable, is misleading; even such a drop creates a directed flow that could result in flooding and contamination. The potential for polluted firewater or chemical runoff reaching these freshwater ecosystems has not been adequately addressed in the application.

### **Fire and Safety Risks**

Lithium-ion battery storage systems pose a well-documented risk of thermal runaway, fires, and explosions—risks that are amplified in rural locations where emergency response times are longer. The application fails to provide sufficient mitigation measures for these dangers.

The proposed fire containment strategy relies on allowing a fire to burn itself out, which is wholly unacceptable. This approach fails to account for toxic smoke inhalation risks, which would pose a direct threat to residents and local wildlife. Additionally, while the proposed 480,000-litre water tank is substantial, no contingency plans exist should the tank fail or require maintenance. The application also does not address how external firefighting resources will be deployed if water reserves are depleted.

National Fire Chiefs Council guidelines state that hydrant supplies should be capable of delivering at least 1,900 litres per minute for a minimum of two hours. Given the site's remoteness and lack of external water sources, the application does not sufficiently demonstrate how fire suppression will be managed effectively.

### **Archaeological Concerns**

The reliability of the Geophysical (Archaeological) Survey Report is fundamentally compromised by several factors. The magnetometer survey concedes that some anomalies remain undetermined, while interference from buried services, pylons, and overhead cables may have obscured important archaeological features. Furthermore, gaps in the dataset - caused by obstructions such as dense vegetation - further diminish its accuracy and completeness.

There is a serious risk that groundworks associated with the Battery Energy Storage System (BESS) could disturb previously undiscovered archaeological remains that were not identified in this survey. Any such disturbance would result in irreversible loss of heritage assets. Additionally, the Historic Environment Desk-Based Assessment indicates that certain heritage assets have "scoped out", while others are yet to be "scoped out". It is imperative that a more comprehensive and methodologically robust assessment is conducted to fully understand and mitigate the potential impact on the area's historical and archaeological significance.

### **Impact on Residential Amenity and Community Engagement**

The claim that this site is appropriate due to its proximity to Little Horsted substation is deeply flawed. The addition of another industrial-scale facility will increase noise pollution from cooling systems and inverters, disrupting the tranquillity of the surrounding countryside.

Furthermore, security and operational lighting will introduce significant light pollution, affecting nocturnal wildlife and altering the natural rural character of the area. They claim that the lighting will be sensor controlled, and with the abundant wildlife activity from larger animals such as deer, badgers and foxes, it is likely that movement sensor lighting will be continually activated.

If this application is approved, smart technology should be used that only detects the presence of humans.

The applicant's approach to community engagement has been inadequate. Although they have presented their plans at our local village hall, the engagement process is diluted with extraneous information, making it difficult to identify any meaningful consultation. The inclusion of stakeholders such as the Planning Committee South, which does not cover this area, and the Alderbrook Community Association, which is based in Crowborough, raises concerns about the relevance of their outreach. Furthermore, the proposed "community benefit" of funding Broad Oak Village Hall's heating system is misdirected, as it fails to provide direct support to the communities within Framfield Parish that will be most affected by the development.

#### **Traffic and Infrastructure Concerns**

The construction and maintenance of this facility will require significant HGV movements along unsuitable rural roads. The proposed access route is a single-track road, ill-equipped to handle heavy vehicles. While the application suggests directing HGVs left out of the site and onto the Lewes Road and the A22 at Halland, sat-nav systems will likely route them through alternative, narrower lanes, or right out of the site, causing additional congestion and posing a hazard to residents and road users. From well documented local engagement, the Palehouse Common Road is a constant concern to local residents due to HGV's travelling through the small hamlet to reach other nearby industrial areas. Many meetings have been had with ESCC Highways because of this issue where HGV drivers are not following prescribed routes.

Moreover, the inclusion of 15 car parking spaces raises further concerns. If the site is only intended for occasional maintenance visits, why is such a high number of spaces required? This discrepancy suggests a higher level of site activity than is being admitted in the application.

#### **Planning Policy Conflicts**

The National Planning Policy Framework (NPPF) and the Wealden Local Plan are clear in their intent to protect the countryside from inappropriate development. While renewable energy and energy storage are crucial to the UK's energy transition, they must be implemented in suitable locations.

Alternative brownfield sites should be prioritised for such developments rather than sacrificing valuable greenfield land. The primary motivation behind choosing this location appears to be financial - minimising land acquisition and infrastructure costs - rather than making a responsible and sustainable planning decision.

#### **Conclusion**

For the reasons outlined above, Framfield Parish Council strongly urges Wealden District Council to refuse this planning application. This proposal represents an inappropriate industrial intrusion into a rural landscape, posing unacceptable risks to the environment, public safety, and local heritage. It is evidently clear that this proposal is purely a financial investment for the applicant.

The Parish Council fully supports renewable energy initiatives, but they must be sited responsibly, with comprehensive environmental protections and community engagement. This BESS development fails on all these fronts and should not be permitted.

#### **5. Any Other Planning matters for reporting at the Discretion of the Chair.**

*To include any other planning applications which may arrive after the agenda has been published at the discretion of the Chairman in line with the terms of reference of the Committee.*  
There were none.

#### **6. Date of Next Meeting – to be advised.**

*The meeting closed at 6.45 pm.*

*Circulation: Planning Committee*