3 Fairholme Crescent
Ashtead
Surrey KT21 2HN

16 April 2026

The Chief Planning Officer
Mole Valley District Council
Pippbrook
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RH14 1SJ

Dear Sir

PLANNING APPLICATION MO 26/00340 – CHANGE OF CONDITION FOR INSTALLATION OF BESS ON LAND NORTH OF BARNETT WOOD LANE ASHTEAD

The Ashtead Residents' Association (ARA) wishes to raise objection to the main proposal contained in MO 26/00340, the variation of Condition 2. This objection is based on the grounds that this change alone is of such significance that it cannot be dealt with as merely a change of condition but needs to be considered fully. Possibly as a new application.

Neither should the other changes to Conditions 12, 13 and 14, so casually requested, be considered without full and proper consultation and scrutiny.

Ashtead and North Leatherhead residents were assured at the Development Management Committee meeting which considered the original application, that MVDC had sought such advice and it is certainly needed now. It is the residents of North Leatherhead, described by the Chairman of the Mole Valley Community Fund as being amongst the most socially deprived in Surrey whose closest green space now stands to be blighted.

This proposal is a considerable change from what was presaged throughout Leatherhead BESS Ltd's original planning material submitted by the same planning consultancy Aardvark EM Limited.

Throughout that documentation repeated mention was made of standard "shipping container" style BESS Units. The Outline Battery Safety Management Plan (OBSMP) produced by Abbott Risk Consulting Limited, but referred to by Aardvark in all other documentation as a 'Battery Management Safety Plan' ("Outline" was omitted) actually stated that "Trina Elementa BESS are to be used" (page 14 of 25 of the OBSMP).

Although Aardvark has provided a further noise assessment, which the acoustics consultant admits is based on noise data provided by the manufacturer. There is no mention of a revised Battery Management Safety Plan.

The replacement BESS units, Fluence Smartstack, are in a new format described as high-density AC-based storage platforms claiming to deliver 30% higher energy density. The single base unit the "skid", contains the electrical and control command centre for the stack with four battery pods, housing the battery cells and integrated sensors stacked on the skid in modules. The base unit weights 11 tonnes and each battery pod 15 tonnes but their modular design makes assembly quicker and easier as everything comes ready prepared to put together.

But 70 tonnes is a huge weight to place on the area to be levelled from the noticeably sloping field.

The proposed Smartstack units are 42% higher, 22% longer and 8% wider than the units described in the original application giving an 87% increase in volume (80.06 cum v. 42.8cum).

Smartstack was only announced to the market in February 2025 based on a prototype designed and developed in Bangalore. Manufacturing commenced in Vietnam in September 2025 with first customer deliveries forecast in the last quarter of 2025. It has not been possible to identify any reference to a "first-of-type" installation.

The monitoring of these BESS units, their remote maintenance, remote diagnosis of problems, their charging and discharging, and advice to the markets about the optimal

times to buy and sell the energy will all be from the Remote Monitoring & Diagnostic Centre in Bangalore.

These Smartstack units are so new it means that there is no "in-use" experience of their operating and safety considerations only the design documentation. The emphasis, as expounded in a corporate YouTube interview of the Managing Director of Fluence India, is saving money and increasing returns on investment. (https://www.youtube.com/watch?v=2iRY_syEUfy)

Despite the reduction in the number of units from 108 to 60 there is an overall increase in volume of 4% but it is the increase in volume over the original 2.9m height proposed which is the most significant factor. The massive increase in volume above the originally proposed "3m or less in height" is considerable and brings a whole new element into the spatial and visual aspects of openness.

The applicant, in the original planning statement said, at 6.2.1, "*openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume*". That planning statement also included "*The majority of the Proposed Development components are 3m or less in height*." If these statements were relevant in the original application, they are no less relevant now.

It can only be speculated as to the effect of the intrusion of this additional mass of structures into the low-level foraging areas of insectivore birds and bats.

The applicant claims that the new units will be '*significantly lower than the tallest infrastructure previous (sic) approved, with elements of the approved sub-station being 6.95m tall*'. This is disingenuous. It is only the busbar taking the power from UK Power Networks grid side into the applicant's transformers and vice versa which is 6.95m tall and that is on the grounds fence clearance and safety.

Safety, however, is an element which Aardvark EM Ltd seem to have overlooked in the fact that the proposed Smartstack units, at 4.1m high are now actually higher than the 14 surveillance cameras, at 4.0m high, around the site to be installed to watch out for intruders and for health and safety reasons. And that height is before any elevated pads on which the units will be assembled.

It is also noted that on the new plans provided there is a conflict between two plans which show the MW/MWH as being 98MW/196MWH on two plans but 98MW/392MWH on the BESS Layout.

Returning to the issue of the acoustic report it is advised by the consultant that noise data provided by the manufacturer has been used but there is no clarification as to whether this is based on design criteria or "in-use" experience.

The main sources of noise are the MV skid (power transformer) and the chillers in the Smartstack unit. "Each Smartstack unit is served by 2 chillers, with the noise source being mainly due to the fan operation. A total of 60no. Smartstack units are proposed, each comprising 2no. chillers." This is a total of 120 chillers fans which, it is suggested, will generally be operating in the "silent hours" as the batteries are recharged from the grid. Only practical experience of the Smartstack units will show what the real-life noise levels are by which time it will be too late for any effective action to be taken.

Regarding the site layout, and an issue which does not seem to have been addressed, is the fact that the whole BESS site will now obstruct what is the only viable utilities route over the existing field to important infrastructure. Thames Water, which has sewerage pipes buried beneath Kestrel field, immediately to the south of Rye Brook and south of the site, gains access to Kestrel field via the entrance to Ashtead Woods at Ashtead Gap. Vehicles which can include loaded bowsers and diggers of considerable weight then follow a track down the western side of the property where there is an access bridge over Rye Brook.

With the BESS in the way this route will no longer be available. It may not seem a problem to Thames Water's staff at the Development Office in Rickmansworth but it is to the operatives who frequently turn up in the vicinity of Bushey Shaw/Links Road/Ashtead Woods Road looking to gain access. This is not a factor which can be brushed aside.

In the autumn of 2024, the Government through the National Energy System Operator (NESO) and OFGEM announced forthcoming changes to the system for the connection of renewable and low-carbon projects to the National Grid. The old system was one of 'first come, first served, but this has now been changed to one of 'the right project in the right place'. Despite this review and a "cull" there are still sufficient projects remaining to reach beyond 2035 and a list which can be considered for future

connection to the grid has been promulgated. But no connection dates have been given nor offered by NESO.

NESO advises in its Connections Reform Results (https://www.neso.energy/industry-information/connections-reform/connections-reform-results) that "there are lots of batteries moving forward in the pipeline as batteries received protections to honour the significant time and investment developers had already put into these projects.

For future application windows, when it comes to batteries there is no permitted capacity to enter the pipeline (which relates to the amount of technologies the UK Government deemed needed) unless one of the following applies:"

a. They qualify under protection clause 2b or 3a in the Connections Network Design Methodology which means the battery will have some form of protection in the next application window; or
b. More than 55GW of G2 battery projects leave the pipeline; or
c. Future strategic energy plans (for example, the SSEP) increase the allowed battery capacity by more than 55GW.

In short, it would seem from the charts, there is a 15% over-supply in battery capacity to 2030 and over 60% to 2035.

In a list of 3428 projects "Merton College", as it is titled by NESO, features 3365th with nearby Rushett Lane, Epsom a little further down the list. (The Excel list actually starts with the first project at line 5). This would seem to indicate that Leatherhead BESS Ltd is only on the list because it is "protected" not because it meets the criteria of "right project in the right place".

It remains, from figures forecast to 2023, that UK Power Networks has 36% headroom of supply over demand at the Chessington Grid Supply Point; Leatherhead Grid has 23% capacity over demand.

It is difficult to envisage that the BESS on the land to the north-west of Barnett Wood Lane will be listed for connection to the grid when there is no demand for it in the area. Particularly when it is known that there is such dire need in the M4 Corridor/Heathrow/West London area.

It is submitted that its real purpose of this project, unless there is to be another local demand not directly related to the requirements of the UK Grid, is to maintain the "blighted" status of this Green Belt site for conversion to some other project favourable to, as the NESO Reform Connections Results lists it, "Merton College".

This project was always at variance with many Mole Valley Local Plan policies. This change to cheaper and easier to install units offering better returns on investment will not be to the advantage of the residents of Mole Valley, Surrey or the UK who will pick up the cost of subsidising the installation if it ever goes ahead.

The change of condition should be refused.

Yours faithfully

Alan Bradley

Alan Bradley
Vice- Chairman