

Dear Mr. Watt,

DM/26/2159 - Land East of Wineham Lane, Wineham, West Sussex, BN5 9AY

Representation on the discharge of Planning Condition No. 8 relating to Planning Application DM/21/2276.

We request that Planning Condition No.8 is **not approved/discharged**, as it may seek to amend the original Application DM/21/2276, beyond reasonable limits, in so far as the details may be more suitably addressed as part of a brand-new Planning Application.

For example, the third amended draft of the Construction Environmental Management Plan (CEMP) posted on 11 September 2026, was amended after MSDC's Adam Draycott raised the point on 9th September, stating that the original application DM/21/2276 contained more restrictive working hours (18 hours less). There may be other details which have yet to come to light, which deviate significantly from DM/21/2276, and should form part of a cohesive new application for the whole site.

Below are highlighted areas which require further clarification and suggested remedies, when assessing the proposed scheme.

We will comment on various points from the CEMP below:

1.3 States that an individual will be appointed as a "local community liaison," as a first point of contact for local residents. When will this happen and when will locals be informed? Will they be residing locally, or are they at the end of a phone in a location remote from the site? From a local's viewpoint this is an important and helpful step to keep us informed.

4.0 Working Hours - These have been amended to be in line with the original approved application, namely 08:00 to 18:00 Monday to Friday and 09:00 to 13:00 on Saturdays. Unless "exceptional circumstances" prevail.

We appreciate this is a project currently anticipated to run over a period of 15 months, and the developer will want to complete the project on time and budget. However, the hours are considerable, given the residential nature of the area and consequent leisure activities, which also go on in the locality of the site. Can these hours be reduced further?

What effect will the BESS construction have on the popularity of the nearby Royal Oak Public House? Will patrons choose to spend a "quiet" summer lunchtime, early evening or weekend lunchtime listening to the construction process or negotiating their journey around HGV's or other obstacles? Or perhaps more likely, they will choose an alternative rural pub. This does not benefit the immediate local economy.

Local residents will not choose, especially over the summer months, to sit out in their gardens, to have noise and dust descend on their quiet enjoyment. The residents of the Country Park may be adversely affected, living in close proximity to the site.

The site and associated construction traffic will endanger road users in Wineham Lane, vehicles, cyclists, horses and walkers. What safety mechanisms will be put in place to protect the locals?

School buses use Wineham Lane and need unfettered access, before and after school. What steps can you take to ensure that the HGV's and their movements will not impede the smooth running of this vital service?

5.1 Construction Vehicle Types and Movements - Table 1 in the CEMP sets out the projected movements over a 15-month timescale.

While it is not unreasonable to expect some associated traffic movements, the type and nature are not suitable for the small country lanes which surround the site. Another representation asks that these routes are clearly set before construction starts, so that everyone is clear what is happening, and what has been agreed.

Table 1 shows that for a period of 7 months there are expected to be 2 or more HGV movements per day. These movements reach their peak in months 7 to 10 inclusive, where there are projected to be over 4.5 HGV movements per day. Are these estimates accurate, or will the numbers rise once approval has been given and works commence? How will school buses and other users of the Lane reach their destination without disruption?

5.4 Delivery Management - We are told that an "appropriate off-highway holding location" will be designated, if a delivery cannot be immediately accommodated on site. Where is this "holding location" envisaged to be, as there are not numerous locations on Wineham Lane capable of accommodating an HGV? Should this be agreed and approved before the Condition is granted?

5.7 Storage of Plant and Materials - This talks about preventing "dust, wind-blown material or contaminated runoff," through secure storage of materials, and avoiding "drainage features and significant surface-water flow routes." It should also be noted that; "fuels, oils and other potentially polluting materials will be stored and handled in accordance with the pollution prevention measures." These points seem to acknowledge that there is a level of risk to humans, wildlife and the ecology/biodiversity in the local area, should something go wrong at any time. What are the processes taking place on the construction site, and is this something that should be shared in detail with the Planning Authority before this Condition is approved?

5.8 Site Security - How safe is the site from vandalism and terrorist threats, if toxic materials are stored on site?

“Acoustic hoarding” has this been approved by MSDC, and what type will be used? Will there be any acoustic hoarding in situ once the site is operational, to mitigate noise emission? Will this require further permissions?

5.9 Protection of the Public Highway - There is a high chance that mud will get onto the highway from the site, which is comprised of clay, and this will be exacerbated in wet weather. Who will monitor this?

Is there a possibility of dangerous materials being transported from the site on the wheels of vehicles, on to the local roads? Will this endanger people, animals or the ecosystem?

8.1 Management of Runoff - is set out under this section of the CEMP. Who externally will monitor compliance during and after construction? While the Planning Authority may set high standards, these may not be met without consistent and careful monitoring.

8.2 Accidental Spillage - “spill kits” will be on site next to “oil storage or refuelling locations,” or “where there is a risk to a water feature.” “The Construction Management Team is responsible for ensuring that spill kits are checked regularly and kept fully stocked and in good repair” and for training workers to use them. “In the event of an accidental release of fuel, oil, coolant or other potentially polluting substance, measures will be taken immediately to prevent the release entering the Site drainage system or wider water environment.”

This demonstrates that there are hazards contained within the site and that they threaten the area outside the site boundary. Who externally is responsible for monitoring “accidental spillages?”

8.3 Storage and use of Fuels and Chemicals - which we are told are governed by Regulations and Guidance. This therefore indicates a level of risk, and we would question whether it is appropriate in a residential area, and the potential harm it could cause to the natural environment. Would the site be attractive to criminals, if it is known what is stored on site and potentially stolen? This could threaten the safety of residents.

8.7 Management of Flood Risk during Dewatering - “All dewatering activities will only occur once the appropriate permissions have been obtained from the Environment Agency.” Who externally will ensure these permissions are obtained?

9.0 Control of Air Quality and Dust - The aim is to “minimise impacts to air quality from vehicles, machinery and plant during construction.”

Who externally will make rigorous checks on this over the 15-month project? Are chemicals involved? Dry weather and potential water restrictions may exacerbate air quality and dust pollution, especially for the residents of the Country Park opposite the BESS site.

10.0 Control of Waste - while under construction these include; “waste chemicals, fuels and oils.” The aim being to prevent “the escape of waste or contamination of the surrounding environment.” This shows that the locality is at risk from the products held within the site, if they are misused or are involved in an accident. What safeguards are there for the local residents?

10.3 Waste Chemicals, Fuels and Oils - it is noted that any used “contaminated” items “must be disposed of in accordance with the Control of Substances Hazardous to Health (COSHH) Regulations.” This is a concern, if the level of toxic compounds on site come within these Regulations. Can hazardous materials be stored off site, outwith the local area?

11.1 Emergencies and Monitoring - How and when will a “list of all nearby stakeholders and receptors” be generated, and how will the catchment area be defined for those “that could be impacted by an environmental incident?”

Who decides on the “list?” What is the worst-case scenario? Will the site impact local property prices and insurance?

A “Fire Safety Management Plan will be prepared prior to the commissioning of the site to encompass the operational phase of the development.” Locals need reassurances in place from the start of the construction work, not just once the site is operational.

How comprehensive is the “plan” for a “general response to any emergency situations arising during construction and commissioning.” Both the Planning Authority and the residents should be aware of the risks to the local area, not just informed that they are covered.

“To reduce the likelihood of an emergency incident arising, daily inspections will be carried out on Site.” This will focus on “any non-compliance with the mitigation measures detailed in the CEMP.” Who will undertake these “daily inspections,” and will they only be over the period of construction, or once the site is operational? Just because the site is under construction does not mean it is safe. The assumption may be that the site only has fire risks once its operational, however, all the components of the BESS units will be on site over some part of the construction process, creating the potential for fires. Will there be a “fire break” around the perimeter of the site, to prevent a fire spreading rapidly through adjoining dry fields in summer months? Hence, locals will want to know that safety is uppermost in the owners and developer’s minds.

11.2 Safety and Security - “security fencing will be installed around the perimeter of the Site and CCTV cameras and motion-triggered lighting will also be positioned around the Site,” once the site is operational.

We note the need for security, is this type of security fencing what was outlined in the original application DM/21/2276? Originally, we were told that the site would be

screened from view, yet the CEMP indicates a high security perimeter fence, cameras and lights. If this is the case, how will the site blend seamlessly into the surrounding landscape hidden from view, neither seen nor heard, in order to live among its neighbours discreetly? The most likely answer from the description in the CEMP is that it will not, as it is not a suitable development for this rural community.

Patrons at the pub will be able to look across to security fencing and CCTV cameras. While residents at the Country Park may be disturbed by “motion - triggered lighting,” being set off by the nocturnal wildlife traffic, which may not have been taken into account. The developer states they wish to protect and not harm wildlife, but what if the wildlife carry oils, chemicals or waste products onto adjoining land/watercourses, additionally causing harm to the wildlife carriers?

How will the site be made to blend in with the local environment?

Reading the CEMP highlights the location’s unsuitability for a BESS in a residential rural area. The site will become a “toxic heart” at the centre of our community, set in ancient countryside. Rather than protecting the green spaces for future generations, we are polluting them, with the effects spreading out from the site to taint the surrounding countryside, potentially well beyond the envisaged 40-year lifecycle of the BESS site.

It would be better to delay development until there is a greater understanding of the technologies used, and the potentially toxic and unsafe nature of BESS.

We therefore propose for the reasons above, that this **Condition is not approved**. Rather **a new Planning Application** should be **submitted** for the whole site, in order that all parties have a full understanding of what is being proposed and how it can be realised safely, if at all, by considering a comprehensive overview contained in one document.

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.

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