

ISH4 BESS at Wyboston Resort on 9th June 2026

IP ref. [REDACTED] Nicholas Bolton

1. BESS DESIGN - DUTY OF CARE

In the Statement of Common Ground SoCG between EPE and Cambs F&RS EN010141/DR/8.6 March 26 :

Section 1.4.1 **The Examining Authority requires that the SoCG be finalised and signed off during the Examination process.**

However in 001,002,003 of this doc where Cambs FRS states its position regarding key elements of the BESS design – and also in Battery Safety Management Plan **BSMP** EN01014184-7.10 section 1.3 - Further as per the email read out during the Hearing from **Cambs F&RS** in their absence, **Detail regarding BESS design and Cabinet spacing** is required to finalise the SoCG.

The Applicant however repeatedly states it is not prepared to commit to specifications until Detailed Design stage – which it proposes would only come after approval of the DCO.

The Applicant said during ISH4 that as technology was changing every 12 months it was unable to commit to a design. The **Community and Cambs F&RS** require certainty including for **safety and training** reasons **THUS** the Applicant needs to demonstrate a clear **financial commitment** to design. Otherwise as elsewhere in the vague or insufficient detail of the Application the Developer makes clear this is a speculative paper exercise showing **no respect for the Community or the Examination process.**

There is therefore a danger that there could be no valid SoCG EN010141/DR/8.6 with Cambs F&RS until AFTER DCO Approval achieved. There is a Duty of Care here which should be upheld.

2. MISLEADING CAPACITY STATEMENTS :

The Applicant repeatedly describes the proposed development as powering 108,000 homes. This is a serious overstatement and misleading to anyone studying the Application.

As the Development has Gate 2 only for the Solar Panels, there will be ZERO energy for much of the Winter months and when the BESS is fully charged from the Solar approximately 1 KWh for each of 100,000 homes. This number does not support Cooking, Boiling kettles, Heating etc. The Examining Authority said that the Applicant will take this point away and address it. **The Community looks forward to seeing a realistic response from the Applicant that does not mislead either Government, the Community or potential Investors.**

3. BESS SAFETY - DUTY OF CARE

Thermal Runaway events are occurring more and more frequently, the Applicant acknowledges such dangers in its responses.

The **Applicant** suggests in BSMP 4.5.9 that such an event will be a **Short term incident**, however in 1.6.5 Table 6.1 the Applicant refers to the BESS being “**Fully consumed/burnt out**”. The Applicant is inconsistent and suggests that even with close coupled 1-3 metre Cabinet spacing it will be able to confine Runaway to a single cabinet. Until the design is finalised this is speculation which does not respect the Examination process or Community concerns. We know from documented events that fires can last days and reignite.

DENZ stated in May 2025 that BESS fires are rare in the UK, yet 2 months earlier Feb/Mch 2025 we have **3 in UK – East Tilbury, Rothienorman and Cirencester none “short-term” events.**

Overseas several Tesla Megapack BESS fires including 2 in Australia and a particularly nasty one at **Moss Landing** in California (The Applicant stressed the latter was of a different design, although the Applicant still has not committed to a final design for EPE, and this was Li-Ion cell fire).

The SoCG 006 - Cambs FRS state that Firefighters should not have to enter BESS site through Thermal Runaway vapour/gas cloud. **However all of the Applicant’s responses are silent on the equivalent risks to the Community.**

The Examination process and Government have a **DUTY OF CARE** here, **The same consideration** must be given to the Communities potentially impacted.

As a reminder, the Moss Landing fire forced evacuation of some 1,500 people within a 4 mile radius of the site – even if the Applicant tries to deflect comparison. Health and Safety was a priority and the Community was considered.

The **Plume test** submitted by EPE uses data from the Met Office for Bedford Aerodrome 7.5 miles West of the BESS site.

The entire test submission shows **South Westerly wind** direction and makes no admission that **WIND DIRECTION IS NOT STATIC**.

Met Office data for St Neots for yesterday afternoon / evening 8th June and overnight showed a Westerly wind coming off the proposed BESS site. These are real conditions. Copy of the Met Chart attached below.
A Plume including HFI and other toxic chemicals is extremely dangerous. There are vulnerable Communities that will be downwind of the BESS in the event of Thermal Runaway.

There is **nothing in EPEs submissions** including the SoCG that recognises Schools, Pre-schools, Care Homes etc in Hail Weston, Little Paxton, Eaton Socon.

Duty of Care requires that these Vulnerable Communities be given the reassurance of clear **Safety and Evacuation Consultation and Planning** within the Application - with all costs underwritten by the Applicant.

IN SUMMARY - the Community needs to know that the **Examining Authority** will **NOT finalise** the examination process until the **BESS DESIGN is finalised** thus a robust BSMP and **VALID SoCG** finalised and signed to the **complete satisfaction of the Examining Authority – and respecting the safety of the Community throughout the potential life of the site.**

Please take this opportunity to **PUSH** for the Government to also recognise its **DUTY OF CARE** and urgently establish a clear **OVERSIGHT / Regulatory framework** for this type of speculative BESS / Solar development before lives are lost.

Met.Office Weather Report for 8.06.2026 for St Neots including Wind Direction (copied from website 5.06.2026).

< > Monday St Neots		3pm	4pm	5pm	6pm	7pm	8pm	9pm	10pm	11pm	12am	1am	< >
Wind													
SPEED													
		11mph Gentle breeze	12mph Gentle breeze	12mph Gentle breeze	12mph Gentle breeze	11mph Gentle breeze	9mph Gentle breeze	8mph Gentle breeze	8mph Gentle breeze	8mph Gentle breeze	9mph Gentle breeze	9mph Gentle breeze	
DIRECTION FROM													
		west southwest	west	west	west	west	west	west	west southwest	west southwest	west	west	
GUSTS													
		23mph	23mph	21mph	21mph	19mph	15mph	13mph	15mph	16mph	15mph	15mph	
Temperature													
ACTUAL (°C)		16°	16°	16°	16°	15°	15°	13°	12°	12°	11°	10°	
FEELS LIKE (°C)		15°	14°	14°	14°	14°	13°	12°	11°	10°	9°	8°	
Rain and snow													
CHANCE		60%	60%	50%	40%	40%	30%	30%	30%	20%	10%	10%	