

10 July 2026

East Park Energy BESS: safety, technology flexibility and Examination confidence

Submission: Post-hearing submission relating to Issue-Specific Hearing 4 on BESS

Stop East Park Energy (SEPE) is an independent, community-led group established in response to concerns over the proposed East Park Energy development. The group operates on an unfunded, voluntary basis and has over 1,000 registered supporters. SEPE includes individuals with professional expertise in agriculture, analysis, civil engineering, construction, ecology and environmental science, energy, finance, law and planning, as well as professional experience with the NSIP process.

Key concerns raised by SEPE included:

1. Whether the impacts assessed today remain representative given that the final BESS technology, battery chemistry and supplier have not been selected, particularly where detailed supplier engagement and technology evaluation had been undertaken pre-application on other DCO projects.
2. The extent to which emergency response arrangements, fire behaviour and thermal runaway risks may vary with future technology choices.
3. Whether the fire modelling assesses the maximum credible thermal runaway scenario rather than only a single-enclosure fire event.
4. Whether future approval processes will provide scrutiny equivalent to that available through the Examination.
5. Whether the flexibility sought remains within the bounds of the impacts assessed and whether substantial weight can therefore properly be attached to the claimed benefits of the BESS.
6. The Applicant's claimed Gate 2 connection position, noting that when asked by the Examining Authority (ExQ1 Q1.1.20) to provide evidence of that position, the Applicant directed the Examination to the NESO TEC Register, yet the relevant entry does not identify any Gate status. SEPE therefore invites the Examining Authority to require clear evidence and details of the Scheme's actual connection position.

7. The continued reliance on substantial BESS benefits despite NGET's confirmation that the BESS has neither been allocated its own grid connection nor qualified for 'Gate 2' status, and the absence of any quantified reassessment of how this affects the capabilities and benefits attributed to the project.
-

Agenda item 3c

Thank you, [REDACTED] on behalf of Stop East Park Energy.

In SEPE's view, the principal issue for the Examination is whether sufficient information is currently available to enable the Examining Authority to understand, test and secure the assumptions underpinning the Applicant's conclusions regarding battery safety, residual risk and community protection before making its recommendation.

A recurring concern expressed by local communities throughout the Examination has been the difficulty in understanding the nature and extent of the risks that are actually being assessed.

Much of the information presented focuses on mitigation measures, management plans and future controls. While those measures are clearly important, communities are also seeking to understand:

- what the principal risks are;
- what assumptions underpin the assessment;
- what the consequences of a significant incident could be; and
- what residual risk remains following mitigation.

The concern is therefore not that mitigation measures have not been proposed. The concern is that communities are being asked to place reliance on mitigation measures without being able to clearly understand the assumptions underpinning the Applicant's conclusions regarding those risks.

The Applicant has confirmed that the final BESS design, battery chemistry and technology provider have not yet been selected and will be determined at detailed design stage.

FM Global, one of the world's leading engineering insurers and risk management organisations, identifies that key aspects of BESS fire safety, including separation, propagation behaviour, monitoring, suppression and long-term operation, may vary according to battery chemistry and system design.

SEPE does not cite FM Global as planning policy, statutory guidance or a regulatory requirement. Rather, it is referenced because it demonstrates that technology selection is not merely a procurement decision. It can influence the assumptions underpinning fire behaviour, monitoring systems, suppression strategies and the long-term operational risk profile of the installation.

Insurer requirements, for example, could require a 3m separation distance between BESS units resulting in a considerable increase in the size of the BESS area.

This reinforces the importance of understanding how the Applicant has demonstrated that the impacts assessed today will remain representative of the technology ultimately deployed.

The Applicant seeks substantial flexibility regarding future BESS operation and replacement activities. The Examining Authority may therefore wish to consider how the implications of ageing, replacement cycles and evolving operational modes have been assessed across the full range of technologies that may ultimately be deployed.

Drawing on my experience of working on a Development Consent Order for a nationally significant energy project, detailed supplier engagement and technology evaluation had taken place prior to submission of the DCO application, enabling the implications of technology selection for design, operation and risk management to be understood.

This raises a question as to how the Examining Authority can be satisfied that any future battery technology selected will remain within the bounds of the impacts assessed.

The Applicant's own Fire Emissions Modelling assessment states that the Emergency Response Plan will be informed by thermal runaway testing undertaken by the eventual BESS supplier. This indicates that elements of the detailed emergency response arrangements remain dependent on future supplier-specific information.

SEPE notes that the Fire Emissions Modelling appears to assess a fire within a single BESS enclosure on the basis that thermal runaway propagation beyond that enclosure is prevented through the proposed design measures.

Given that the final battery chemistry, supplier and system configuration have not yet been selected, the Examining Authority may wish to ask whether the fire scenario assessed within the Fire Emissions Modelling represents the maximum credible thermal runaway propagation scenario within the proposed 100MW BESS design envelope and, if not, why the Applicant considers a single enclosure fire scenario to be representative of the impacts that may arise from the flexibility sought.

In addition, it may assist the Examining Authority to understand whether any community protection measures have informed the assessment, and where the assumptions regarding remote monitoring, incident detection, emergency service notification and intervention have been assessed and tested within the Examination material.

The Examination has already heard through Local Impact Reports and Statements of Common Ground that Host Authorities do not necessarily maintain specialist in-house expertise across all of the technical disciplines engaged by the Proposed Development. The Examining Authority may therefore wish to consider whether future approval processes would provide a level of scrutiny equivalent to that currently available through the Examination itself.

The difficulty for the Examining Authority is that it is being asked to conclude that the impacts assessed remain representative while important elements of the final technology, supplier and detailed safety arrangements remain subject to future determination.

The Applicant seeks substantial weight to be attached to the benefits of the proposed BESS while retaining significant flexibility regarding the technology and safety systems that may ultimately be deployed.

The central question is therefore a simple one: has the Applicant provided sufficient evidence to demonstrate that the flexibility sought remains within the bounds of the impacts assessed and that substantial weight can properly be attached to the benefits attributed to the BESS?

Any other business

Thank you Mr Sword, two brief points if I may.

Firstly, arising from ExQ1.1.20. The Applicant confirmed that the Scheme had received a Gate 2 offer and directed the Examination to the NESO TEC Register as evidence of that position. SEPE has reviewed the latest TEC Register, dated 5 June 2026, and notes that the entry which appears to correspond to the Proposed Development does not identify any Gate status. Could the ExA please ask the Applicant to explain the omission.

Secondly, to reiterate earlier comments by both [REDACTED] and [REDACTED], NGET's Written Representation states that the solar element has received a Gate 2 offer whereas the BESS remains at Gate 1, and that NGET is currently progressing design work only for the solar connection.

Given the weight the Applicant attaches to the benefits of the proposed BESS, including flexibility, balancing services, energy security and intermittency mitigation, the Examining Authority may wish to seek clarification from the Applicant as to

whether any reassessment has been undertaken of those claimed benefits in light of the current connection position.