Tween Bridge Solar Farm

9.13 Statement of Common Ground with South Yorkshire Fire & Rescue Service

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1 Introduction

1.1. Purpose of this document

1.1.1. This Statement of Common Ground (hereafter referred to as the 'SoCG') has been prepared to support the Examination of the Development Consent Order (DCO) application (the 'DCO Application') for Tween Bridge Solar Farm (the 'Scheme').

1.1.2. The DCO Application is for a Nationally Significant Infrastructure Project (NSIP) for the construction, operation (including maintenance) and decommissioning of a solar photovoltaic (PV) array electricity generating facility, Battery Energy Storage System (BESS) and associated infrastructure which would allow for the generation and export of electricity.

1.1.3. ~~The~~This SoCG ~~is~~has been a 'live' document through the course of the Examination that has been prepared by the Applicant and South Yorkshire Fire & Rescue ~~('SYFR'~~Service ('SYFRS') Consultee.

1.1.4. The SoCG has been prepared in accordance with the Guidance for examination of DCO applications which was published in 2024 by the Department for Levelling Up, Housing and Communities1.

1.1.1. This Guidance comments that:

"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority'.

~~1.1.2.~~ The aim of this SoCG is to therefore provide a clear position of the progress and agreement made or not ~~yet~~ made between the Applicant and the ~~SYFR~~SYFRS on matters relating to the Scheme. ~~Where matters are yet to be agreed, the parties will continue to proactively work to reach agreement.~~

~~1.1.3.~~1.1.2. ~~The SoCG will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and SYFR.~~

1 Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (April 2024)

1.2. Parties to this Statement of Common Ground

1.2.1. This SoCG has been prepared by (1) the Applicant and (2) ~~SYFR~~SYFRS.

1.2.2. The scheme comprises BESS infrastructure located within the administrative boundary for ~~SYFR~~SYFRS services. BESS can present a unique fire-safety risk and engagement helps ensure those risks are understood and suitably mitigated and planned for in the event of an emergency.

1.2.3. Collectively, the Applicant and ~~SYFR~~SYFRS are referred to as 'the parties'.

1.3. Terminology

1.3.1. Section 3 of this document sets out the relevant matters raised ~~though~~through discussion between the parties. It provides a summary of the position of each party and identifies the status of discussions on each matter~~:~~.

~~1.3.2. "Agreed" indicates where the issue has been resolved between the parties and is not anticipated to be subject to further discussions;~~

~~1.3.3. "Under discussion" indicates where a matter remains in active dialogue between the parties and a final position has not been reached;~~

~~1.3.4.~~1.3.2. ~~"Not Agreed" indicates where the parties have established a final position that they cannot resolve the matter and will remain a point of difference.~~All matters in this SoCG are "agreed". This confirms that both parties have no unresolved matters.

2 Record of Engagement

2.1. Summary of consultation and engagement

2.1.1. The parties have been engaged in consultation and engagement throughout the development of the Scheme. Table 2-1 shows a summary of the meetings and correspondence that has taken place between the Applicant and ~~SYFR~~SYFRS in relation to the Scheme. This is limited to engagement which is materially relevant to the contents of this SoCG and does not seek to include every correspondence between the parties (e.g. that which was primarily administrative).

2.1.2. Table 2-1: Record of Engagement

Table 2-1 – Record of Engagement since 2023		
Date	**Method**	**Purpose / Description**
November 2023	Consultation Response Letter	~~SYFR~~SYFRS were contacted during the non-statutory consultation to advise of the proposed development. ~~SYFR~~SYFRS provided a written response to the consultation.
May 2025	Consultation Response Letter	~~SYFR~~SYFRS were contacted during the statutory consultation to advise of the proposed development. ~~SYFR~~SYFRS provided a written response to the consultation.
April 2026	Email	~~SYFR~~SYFRS confirmed they wanted to engage in the preparation of a Statement of Common Ground.
April – September 2026	Email	Email correspondence between the SYFRS and the Applicant to progress the Statement of Common Ground.

3 Current Position

3.1.1. The table below provides a summary of the current position of the Applicant and ~~SYFR~~SYFRS in relation to specific matters that have been under discussion to date.

3.1.2. Where a matter is not represented in the table, it should be assumed that it is either: (i) agreed between the parties and has not been the subject of detailed discussion; or (ii) not relevant to the discussion between the parties.

3.1.3. As noted above, this ~~is~~SoCG has been a 'live' document ~~and there are some aspects that are still under discussion between~~throughout the ~~parties. The intention is to provide a~~course of the Examination. This version of the SoCG represents the final position ~~in subsequent versions of the SoCG, addressing and~~ identifying where changes have been made and where agreement had been reached between the parties.

Table 3-1: Current Position:

Ref	Topic	South Yorkshire Fire & Rescue Position	Applicant Position	Status
~~SYFR 1~~SYFRS1	Guidance	~~SYFR~~SYFRS advises that the guidance in the following documents is considered as part of the design process: ~~3.1.1.~~• NFCC Grid Battery Energy Storage Systems Planning – Guidance for Fire and Rescue Service ('FRS') ~~3.1.2.~~• National Fire Protection Association (NFPA) 855 Standard for	The Applicant has considered the listed guidance to inform the preparation of the proposals. Assessment of the proposals against the NFCC Guidance for FRS is provided in the **Outline Battery Safety Management Plan (BSMP)** [~~Document Reference 7.4 Revision 2~~REP5-028] and the detailed Battery Safety Management Plan, secured	Agreed

		the Installation of Stationary Energy Storage Systems. ~~3.1.3.~~ FM Global Property Loss Prevention Data Sheets 5-33, as revised January 2024	through Requirement 7 of the Draft Development Consent Order [APP016] will be completed in accordance with the outline plan.	
~~SYFR~~SYFRS 2	Firefighting Arrangements	~~SYFR~~SYFRS procedures for fighting BESS fires may involve the use of multiple high reach appliances. This is to ensure that sufficient distance can be created to safeguard our attending crews from residual electrical current. Please ensure that suitable access roads are provided to support the weight of these appliances; please also ensure that there are no overhead obstructions (i.e. trees or overhead power lines) in the area around the BESS.	There is access to all BESS locations avoiding signed weight restrictions on the highway network in the event of an emergency. The **Transport Statement [APP-111]** and **Outline Construction Traffic Management Plan [~~APP-182~~REP6-038, REP6-040, and REP6-042]** confirm the locations of the weight restrictions within the local highway network. There are no overhead obstructions (trees or overhead power lines) in the area around the BESS.	Agreed
~~SYFR~~SYFRS 3	Firefighting Arrangements	Markings externally to the containers (similar to aircraft) to notify crews where a lance or stinger can be used without damaging any cells. Clear instructions and markings will aid crews in being able to tackle the fire quickly with the working site knowledge of the system.	The Applicant agrees in principle. The exact details of the proposals will be agreed post consent.	Agreed

~~SYFR~~SYFRS 4	Site Access	The NFCC guidance states at least 2 separate access points to the site to account for opposite wind conditions/direction. Firefighters should not have to enter the BESS site or drive through a vapour / gas cloud to reach the scene of operation, therefore an alternative access point, taking into account wind direction, is preferable. The principles contained within Approved Document B, in support of B5 may assist in providing proportionate and adequate provision of access and facilities for firefighting. Section 15 provides information relating to access routes and hardstanding areas that consider the dimensions of fire service vehicles. Where access is over 20m from the access road, a turning circle, hammerhead or other point at which a vehicle can turn should be provided. Road / hard standing should be suitable to accommodate fire service vehicles in all weather conditions. Appliance dimensions are variable and designers should take account of this. ~~SYFR~~SYFRS appliance dimensions for the current fleet are as follows:	The Scheme is compliant with NFCC guidance as confirmed in the **Outline BSMP [~~Document Reference 7.4 Revision 2~~REP5-028]**.	Agreed

<table>
<tr>
<td></td>
<td></td>
<td>Scania Rescue Pumps and Scania Turntable Ladders
<table>
<tr><th>Type</th><th>Turning Circle (Metres)</th><th>Front Axle (kg)</th><th>Rear Axle (kg)</th><th>Height (Metres)</th><th>Length (Metres)</th><th>Width (Metres)</th><th>Weight Gross (kg)</th></tr>
<tr><td>Scania Rescue Pump</td><td><17</td><td>6152 kg actual

7500 kg MAM</td><td>8086 kg actual

11500 kg MAM</td><td>3.33</td><td>8.7</td><td>2.5

including mirrors 3.0</td><td>14500kg actual

18000kg MAM</td></tr>
<tr><td>Scania Turntable Ladder</td><td><19</td><td>6,356 kg actual

8500 kg MAM</td><td>10120 kg actual

11500 kg MAM</td><td>3.50</td><td>10.5</td><td>2.55 including mirrors

With jacks deployed

4.84</td><td>16476 kg actual

18000kg MAM</td></tr>
</table></td>
<td></td>
<td></td>
</tr>
<tr>
<td>~~SYFR~~SYFRS 5</td>
<td>Water Supply</td>
<td>In the event of a fire involving BESS, it is likely that ~~SYFR~~SYFRS will need to apply a higher than average volume of water to restrict fire spread. Please ensure that there is an adequate water supply within 90m to allow continuous firefighting operations to take place; please also ensure due consideration has been given to containing fire water run-off.</td>
<td>The Applicant confirms the BESS will be located within appropriate distance to adequate water supply. This is shown on the Illustrative Layout and Cross Section Plan [APP-015].</td>
<td>Agreed</td>
</tr>
<tr>
<td>~~SYFR~~SYFRS 6</td>
<td>Water Supply</td>
<td>Separators, under the site can be introduced, to container fire water run-off. Firefighting run-off water can have a serious impact on the environment and nearby open water. Having water separators under the site to contain this hazard means the water can be properly disposed of after the incident.</td>
<td>The outline surface water drainage strategy included in the Flood Risk Assessment [~~APP-108~~REP5-014 and REP5-016] has been designed to manage potentially contaminated fire water and ensure it does not pollute the local water environment. Any fire water will be contained below ground prior to testing</td>
<td>Agreed</td>
</tr>
</table>

			and subsequent release or disposal, as appropriate.	
~~SYFR~~SYFRS 7	Spacing between BESS units	In order to restrict fire spread it is essential that suitable space be maintained around the BESS. If this space is not provided this may allow rapid fire to spread to nearby structures and combustible items. The emergency response plan should be predicated on the scenario of the fire will not spread beyond the BESS container of origin. With fire and rescue operations limited to boundary cooling of surrounding BESS and monitoring the BESS involved in thermal event. This outcome can be achieved through a number of different routes including: ~~3.1.4.~~ • Adequate separation between the BESS enclosures to ensure that the radiant heat from a thermal event in one BESS will not trigger a secondary event. ~~3.1.5.~~ • Provision of fire resistant materials that will prevent direct flame impingement or radiated heat affecting adjacent BESS and allowing	The Applicant has provided an indicative layout for a 100MW BESS within the **Indicative Layout and Cross Section Plans (Rev 1) [~~APP-015~~REP3-005].** The Applicant has provided an indicative layout for a 100MW BESS within submission document **Indicative Layout and Cross Section Plans (Rev 1) [~~APP-015~~REP3-005],** which confirms the BESS layout within the Scheme can accommodate gaps between the containers in accordance with the NFCC guidance. The approval of final layouts are secured through Requirement 6 of the **Draft DCO [Document 3.1 Revision ~~3~~10]** which will also ensure compliance with the guidance. **Appendix A of the Outline BSMP [~~Document Reference 7.4 Revision 2~~REP5-028]** responds to the Frequently Asked Questions regarding BESS developments including Thermal Runaway Propagation, the fire detection and suppression systems. The final details of the BESS and BSMP will be provided post consent and controlled through Requirement 7 of DCO, as	Agreed

		the incident to develop beyond BESS of origin. • The provision of a suppression system to the BESS is unlikely to provide a compensatory feature to allow reduced spacing between BESS.	detailed in the **Draft Development Consent Order [Document Reference 3.1 Revision ~~3~~10].**	
~~SYFR~~SYFRS 8		In the event that the developer cannot demonstrate that a thermal event / fire can be contained to the BESS of origin, then the developer should be referred to guidance such as the separation distances within NFPA 855 (current edition - 2023). NFPA 8551 states separation can be reduced to at least 3 feet or 0.914m between BESS if tests such as UL 9540A shows propagation does not occur. Consideration should also be given to the provision of automatic suppression systems within each container to delay fire spread to neighbouring BESS units. With consideration for 'In rack' suppression as the external system may not penetrate the racks. Design of the suppression system is key to reducing the fire and fire spread, design of the system should be created by a Responsible Person such as a Fire Engineer.	The Scheme is compliant with NFCC guidance as confirmed in the **Outline BSMP [~~Document Reference 7.4 Revision 2~~REP5-028]** and the design principles are agreed. The final details of the BESS and BSMP will be provided post consent and controlled through Requirement 7 of DCO, as detailed in the **Draft Development Consent Order [Document Reference 3.1 Revision ~~2~~10].**	Agree

		External audible and or visual warning to denote if the detection has activated or if the suppression has been deployed. Information and clear indication of warning and activation of systems is vital to fire operations on site. This will give notice to fire crews if another unit on site is affected by the fire or system malfunction.		
~~SYFR~~SYFRS 9		Remote activation of the suppression system so that the monitoring station can activate. When a site is monitored remotely, remote activation and communication between crews on site and the remote monitoring centre should be made available with clear instructions on how to do so with a 24hr telephone number.	Paragraph 6.3.1 of the **Outline BSMP** [~~**Document Reference 7.4 Revision 2**~~**REP5-028**] confirms that the BESS supplier will demonstrate with evidence that a layered protection approach from cell to container to remote monitoring is provided.	Agreed
~~SYFR~~SYFRS 10		Blast walls across each entrance and between units to reduce the blast risk to first responders and limit radiated heat to other units. Reducing the risk of fire spreading to more than one unit a prioritised concern for the fire crews so any facilitation to reduce this risk is more than beneficial.	Blast walls are not considered necessary, as the adopted design strategy incorporates alternative fire safety measures which, in the unlikely event of a fire, would effectively limit fire spread.	Agreed
~~SYFR~~SYFRS 11	Spacing to other buildings	Proposed distances should take into account risks including the impact of any vapour	The design strategy incorporates fire safety measures which, in the unlikely	Agreed

	beyond site perimeter	cloud and also any mitigation factors that have been incorporated into the site design. However, an initial minimum distance of 30m is proposed prior to any mitigation such as blast walls. This distance is based upon the 100ft distance cited in NFPA 855 for remote installations.	event of a fire, would effectively limit and manage any fire to spread.	
~~SYFR~~SYFRS 12	Environmental Impact	A well-developed fire involving BESS may have a large negative impact on the local environment. The Environment Agency should be involved at an early stage to discuss ways in which the environmental impact of this can be mitigated. A plan should be prepared to assist in discussions with developers and planners regarding the suitability of a site location highlighting all sensitive receptors within a 1km radius of the site to allow for appropriate emergency planning. Examples of sensitive receptors may include: ~~3.1.6.~~ • Schools, hospitals, nursing and care homes, residential areas, workplaces. ~~3.1.7.~~ • Protected habitats, watercourses, groundwater,	The Applicant agrees environmental context is important when locating BESS. Specific plans for sensitive receptors for the BESS have not been prepared. However, the receptors have been identified in the baseline assessments supporting the Environmental Statement which have informed the location of the BESS within the scheme. The locations of the BESS are illustrated in **Environmental Statement Figure 2.2a: Indicative Operational Layout Plan (Fixed Solar Panels) [~~APP-134~~REP4-037]** and **Environmental Statement Figure 2.2b: Indicative Operational Layout Plan (Fixed and Tracker Solar Panels) [~~APP-134~~REP4-038]**.	Agreed

		boreholes, wells and springs supplying water for human consumption. Further habitat information can be found on the DEFRA MAGiC map website. ~~3.1.8.~~ Roads, railways, bus stations, pylons (on or immediately adjacent to the site only), utilities, airports. Any plans created should have a compass rose showing north and the prevailing wind direction.		
~~SYFR~~SYFRS 13	Emergency Plans	Site operators should develop emergency plans and share these with the Fire and Rescue Service. **A Risk Management Plan** should be developed by the operator, which provides advice in relation to potential emergency response implications including: ~~3.1.9.~~ The hazards and risks at and to the facility and their proposed management. ~~3.1.10.~~ Any safety issues for firefighters responding to emergencies at the facility.	The **Outline BSMP [~~Document Reference 7.4 Revision 2~~REP5-028]** incorporates the management activities relevant to safety. Further details will be captured within the Details Battery Safety Management Plan post consent, required to be submitted through **dDCO Requirement 7 [Document Reference 3.1 Revision ~~2~~10]**.	Agreed

		~~3.1.11.~~ Safe access to and within the facility for emergency vehicles and responders, including to key site infrastructure and fire protection systems. ~~3.1.12.~~ The adequacy of proposed fire detection and suppression systems (e.g., water supply) on-site. ~~3.1.13.~~ Natural and built infrastructure and on-site processes that may impact or delay effective emergency response.		
~~SYFR~~SYFRS 14	Emergency Plans	**An Emergency Response Plan** should be developed to facilitate effective and safe emergency response and should include: ~~3.1.14.~~ How the fire service will be alerted ~~3.1.15.~~ A facility description, including infrastructure details, operations, number of personnel, and operating hours. ~~3.1.16.~~ A site plan depicting key infrastructure: site access points and internal roads; firefighting facilities (water tanks, pumps, booster systems,	The Applicant has committed to preparing an Emergency Response Plan within the **Outline BSMP [~~Document Reference 7.4 Revision 2~~REP5-028]**, to be developed in conjunction with the FRS.	Agreed

		fire hydrants, fire hose reels etc); drainage; and neighbouring properties. ~~3.1.17.~~ Details of emergency resources, including fire detection and suppression systems and equipment; gas detection; emergency eye-wash and shower facilities; spill containment systems and equipment; emergency warning systems; communication systems; personal protective equipment; first aid. ~~3.1.18.~~ Up-to-date contact details for facility personnel, and any relevant off-site personnel that could provide technical support during an emergency. ~~3.1.19.~~ A list of dangerous goods stored on site. ~~3.1.20.~~ Site evacuation procedures. ~~3.1.21.~~ Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, grassfire and bushfire		

~~SYFR~~SYFRS 15	Emergency Plans	Site Information Box (SIB) with action cards, plans and a risk assessment. Up to date and accurate site data will aid firefighters on arrival at site, upon fire incidents.	The Applicant has committed to providing a Site Information Box at the site. This commitment is made in the **Outline BSMP [~~Document Reference 7.4 Revision 2~~REP5-028]**, to be developed in conjunction with SYFRS. Further details will be captured within the detailed Battery Safety Management Plan post consent, required to be submitted through **Draft DCO Requirement 7 [~~REP1-004~~Document Reference 3.1 Revision 10]**.	Agreed
~~SYFR~~SYFRS 16	Recovery	A post-incident recovery plan should be developed that addresses the potential for reigniting of BESS and de-energizing the system, as well as removal and disposal of damaged equipment.	The Applicant has committed to providing details of a post-incident recovery plan in the **Outline BSMP [~~Document Reference 7.4 Revision 2~~REP5-028]** and further details in the detailed BSMP. Further details will be captured within the detailed BSMP post consent, required to be submitted through **Draft DCO Requirement 7 [~~REP1-004]~~ Document Reference 3.1 Revision 10].**	Agreed

4 Signatures

This Statement of Common Ground is agreed upon:

On behalf of South Yorkshire Fire and Rescue:

Name:

Signature:

Date:

On behalf of the Applicant:

Name:

Signature:

Date: