

[REDACTED]

From:

Sent:

[REDACTED]
16 October 2025 18:53

To:

Springwell Solar Farm; [REDACTED]
[REDACTED]@lincolnshire.gov.uk

Subject:

Late deadline 5 submission

Attachments:

25_0491_FUL-UKHSA_COMMENTS-2445093.pdf

20052314

We have appended a document from UKHSA in relation to BESS at Green Man lane Navenby. The issues raised in this document are absolutely relevant to the Springwell application. The BESS site at Springwell is larger and



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Our Ref: CIRIS 92951

Your Ref: 25/0491/FUL

9th October 2025

Dear North Kesteven District Council,

Planning Application for: Battery Energy Storage System (BESS) and associated infrastructure on land to the south Of Green Man Road Navenby LN5 0AY - 25/0491/FUL

Thank you for forwarding a copy of this Planning Application consultation to the UK Health Security Agency (UKHSA) on 28th August 2025.

We previously replied to you on 20th June 2025 stating we do not normally respond to these types of planning application consultations unless the council have specific health concerns. Following local community objections based on health concerns you have requested comments from us.

It is understood that the planning application is for a Battery Energy Storage System (BESS) and associated infrastructure on land to the south of Green Man Road Navenby LN5 0AY.

UKHSA has the following comments in regard to the proposed development.

1. Fire Safety and Air Quality Assessment

The proposed 3.5-meter container separation is materially non-compliant with the current National Fire Chiefs Council (NFCC) guidance, which suggests a minimum 6-meter separation to prevent the spread of fire via thermal radiation and to allow safe access for emergency services.

The applicant's low-risk air quality conclusion is based on dispersion modelling for a "worst-case scenario" of only 12 battery modules on fire. The non-compliant 3.5m spacing significantly increases the probability of a domino effect (thermal runaway) that spreads well beyond 12 units. This design failure renders the air quality modelling and its conclusion of "no noticeable discomfort" unreliable and insufficient to safeguard the community.

The assessment fails to address the high probability that a lithium-ion fire will be left to burn out for days or weeks due to Fire and Rescue Service (FRS) potential protocol. This prolongs the potential exposure of nearby residents to toxic gases (Hydrogen Fluoride, Carbon

Monoxide) and carcinogenic particulates (PM2.5), representing a severe chronic health risk not considered in the Acute Exposure Guideline Level 1 (AEGL-1) analysis.

2. Contamination Risk to land and groundwater

The site is underlain by the Lincolnshire Limestone Aquifer, which is highly vulnerable to contamination due to its permeable nature.

We would ask the planning regulator is satisfied whether the proposed 300m³ firewater lagoon capacity is sufficient to contain the combined volume of fire suppression water and a severe rainfall event. The failure to contain this water would lead to the release of highly toxic firewater runoff (containing heavy metals and corrosive acids) into the aquifer, posing potential contamination risk to land and groundwater, the public water supply and environmental health.

3. Absence of an assessment on electromagnetic fields (EMF)

The application completely omits any assessment of Extremely Low Frequency (ELF) Electric and Magnetic Fields (EMFs). Given the presence of high-voltage transformers and high-current power conversion systems close to residential receptors, a formal assessment demonstrating compliance with ICNIRP guidelines is a non-negotiable requirement for public health reassurance.

4. Long-Term Public Health Risk (Decommissioning)

The applicant's commitment to deal with the battery waste (anticipated circa 2074) is unacceptably vague, relying on "legislation in place at the time." The disposal of thousands of tonnes of hazardous lithium-ion battery waste (toxic and highly reactive) is a vast and extremely expensive undertaking. The council may want to consider whether a more detailed decommissioning framework is required.

5. Noise and cumulative effects

The applicant has undertaken a noise assessment that although compliant with the National Planning Policy Framework (NPPF) and the Noise Policy Statement for England (NPSE) still concludes nighttime noise will not to be below the LOAEL. However, noise impacts have not addressed future infrastructure and cumulative effects. The council may wish to consider the cumulative impacts.

The planning authority may wish to contact the local authority public health team for matters relating to wider determinants of health associated with this development/proposal.

Yours sincerely

