

Beacon Fen Energy Park: EN010151

Date: 6/10/2025

Please find below my written representation to the above project as the County Council representative for the Boston Rural District.

Regarding cumulative effect, it is already apparent to the residents of the Bicker area, that not only is their local road network continually being damaged, inconveniencing journeys whilst repairs are undertaken, but construction dust in the air significantly impacts the environment during parts of the year coating vehicles and properties in dust. Frequent misuse and clear flouting of traffic management plans on marked 'non HGV' routes by a multitude of vehicles, both HGV and smaller, further adds to a level of distrust in developers to adhere to commitments at a basic level. How does this then show a good level of working practice and therefore apply to more serious elements of the construction as a culture of corner cutting.

The substation area is already saturated with applications and connections, can the applicant demonstrate they have been granted a connection by National Grid, or would further expansive work be required to the substation.

To date, none of the applicants seem to use shared corridors for cable routes for example and so each applicant serves to provide a new set of negative impacts to the community.

Currently BESS is still not robustly regulated and therefore a myriad of risks still remains.

It is a reality that the UK is under constant cyber security threat, risk to the BESS element specifically give grounds for concern that once this or any similar system is online, it therefore forms part of our UK energy supply network. Should it become remotely compromised, bad actors could cause malfunction or shut downs of systems during operation. This is totally unacceptable and to approve a BESS application without suitable safeguards in place would be entirely unsafe.

Thermal runaway generates very high temperatures and requires different firefighting methods. It is usually best not to try to put out the fire, but rather to control the spread. Firefighters also have to contend with severely toxic gas emissions, the risk of an explosion, soil contamination and damage to watercourse

The location of this site is in a rural area, served primarily by retained firefighters, who are a long way from where specialist firefighting resources would come from, and this does not seem to be taken into account fully in the planning process.

The applicant may propose water-based suppression systems, off-gas detection, ventilation systems and thermal runaway mitigation as design conditions. The guidelines for planning approval of BESS are imprecise and vary across the devolved nations. Currently, the burden of responsibility falls on individual local authority planning officers who have no specific training or background in lithium-ion technology.

██████████ Suffolk's deputy chief fire officer asked for fire services to be given new powers, saying:

"I'd like to see a power that is akin to a regulatory order like those for a commercial property, where we would have the power to enforce safety measures on those sites."

He explained that the fire service is currently just a "contributing partner", able to give "direction and professional advice", but not necessarily to require what it might like.

The result is inconsistency, which is destructive both of public trust and of the success of the industry.

The Grenfell disaster was the end result of many failings by both individuals and companies, but at heart it was a failure of regulation. The rules left things wide open for exploitation by cost-cutting developers, which is exactly what happened. Just as with lithium-ion batteries, a new technology—in that case cladding—was being used at scale for the first time, without proper understanding of the risks.

In September 2020, a fire at a BESS site in Liverpool created a significant blast and took 59 hours to extinguish. Merseyside Fire and Rescue Service said that the blaze on Carnegie Road "appears to be the first significant fire of its type to occur within the UK".

However, this was only a small BESS, with just four containers and a modest 20 MWh output in total.

This project is for 600MWh in comparison and 156 containers.

I note on the [2.6 Illustrative Layout Plan of Battery Energy Storage System and On-Site Substation \(PDF, 2MB\)](#)

A prevailing wind rose is not present to help the fire officers to correctly assess a fire management strategy.

The UK's regulatory approach to BESS safety relies on performance-based regulations such as the Regulatory Reform (Fire Safety) Order 2005 and the Building Regulations 2010. They place the responsibility on the responsible person—the site owner—to ensure that adequate safety measures are in place, but they lack specific provisions tailored to BESSs. Too much reliance is being placed on individual owners to mark their own homework.

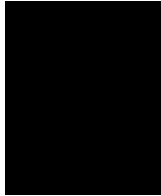
There are also the environmental impacts. The Environmental Protection Act 1990 and the Water Resources Act 1991 provide a general framework for managing environmental impacts but, again, they do not specifically address the challenges posed by BESS fires. Existing regulators do not seem to know whose responsibility this should be. In a recent application for a solar park at Cleve Hill in Kent, which includes battery storage, the Department for Energy Security and Net Zero stated that the Health and Safety Commission should be consulted on safety advice, but the HSC itself said that commenting on battery safety management plans was not in its remit. That confusion is not exactly reassuring.

It is also disingenuous to use advertising material on websites and printed materials showing sheep grazing under solar panels. This is not evidenced to be the case on any other solar project I've seen in the area. Moreover, to manage the grass and weeds that do grow up under panels, land is treated with weedkiller or other methods to keep the grass down, in a sense of improving the BNG this is doing the exact opposite and likely contaminating the ground in ways the farming community are restricted from doing. This will not be returned to farming in a better condition than it currently is post its 'temporary' change to energy production.

Lincolnshire, in particular the southern part is known as the breadbasket of England, should a disaster occur, the risk to contamination of the water ways and land is great, it would therefore put at risk key food production in the surrounding area that we depend upon as a nation.

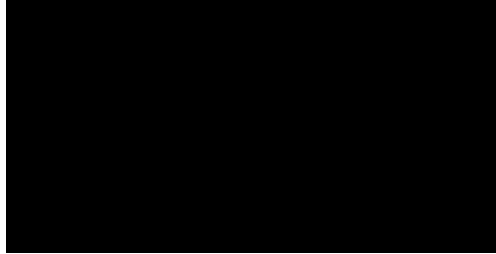
I do hope these comments are of use to the inspector in forming a safe and reasonable decision for the people of Lincolnshire.

In summary, the time to act is now because the number of BESS applications is expanding exponentially and we do not want to be the place or the people that learn from a great mistake.



Cllr Paul Lock

Boston Rural



Lincolnshire County Council

