FENWICK SOLAR FARM

Fenwick Solar Farm EN010152

Statement of Common Ground between Fenwick Solar Project Limited and South Yorkshire Fire and Rescue Service

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The Infrastructure Planning (Examination Procedure) Rules 2010

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Revision History

Revision Number	Date	Details
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Prepared for: Fenwick Solar Project Limited

Prepared by: AECOM Limited

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Statement of Common Ground

Signatures

This Statement of Common Ground has been prepared and agreed by Fenwick Solar Project Limited and South Yorkshire Fire and Rescue Service.

, NSIP Development Manager on behalf of Fenwick Solar Project Limited

Date: 30 April 2025

Signed:

Name, Position Business Fire Safety, on behalf of South Yorkshire Fire and Rescue Service.

Date:.....<u>: 29 May 2025</u>

Signed:....: See Appendix A

1. Introduction and Purpose

1.1 Purpose of this Statement of Common Ground

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared for the examination of an application (the Application) made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 (Ref. 1) for the proposed Fenwick Solar Farm (the Scheme). The Application is submitted by Fenwick Solar Project Limited (the Applicant).
- 1.1.2 This SoCG does not seek to replicate information available elsewhere within the Application documents. All documents are available on the Planning Inspectorate's website at https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010152/documents.
- 1.1.3 SoCG are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination. This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties and where matters are under discussion or where agreement has not been reached. It has been progressed during the preexamination and examination period to reach a final position between the Applicant and South Yorkshire Fire and Rescue Service (SYFRS).
- 1.1.4 The ExA requested the SoCG include the following matters as set out in the Rule 6 Letter [PD-005]:
 - a. Approach to assessment of effects on battery safety including methodology employed and assessment of significance of effects.
- 1.1.5 All comments received from SYFRS following the issue of the Environmental Impact Assessment (EIA) Scoping Report, Non-Statutory Consultation, Preliminary Environmental Information Report and Statutory Consultation have been addressed throughout the Application process and the Applicant's responses are detailed in the corresponding technical documents submitted with the Application. This SoCG includes comments received from SYFRS within their Relevant Representation submission as these are deemed as the remaining matters for discussion.
- 1.1.6 It can be taken that any matters not specifically referred to in Section 3 of this SoCG are not of material interest or relevance to SYFRS's representations and therefore have not been considered in this document.
- 1.1.7 Full responses to all comments raised within SYFRS's Relevant Representations are provided within the Applicant's Responses to Relevant Representations.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared between (1) the Applicant and (2) SYFRS (jointly referred to as the Parties).
- 1.2.2 The Applicant is a wholly owned subsidiary of BOOM Developments Limited who specialise in non-subsidised solar and battery storage projects.

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1.2.3 SYFRS is the statutory fire and rescue service (FRS) for South Yorkshire, serving the metropolitan borough of Barnsley, Doncaster, Rotherham, and Sheffield. It completes firefighting and rescue operations and provides fire prevention and safety advice, as well as other specialist services. SYFRS is listed as a prescribed consultee in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (Ref. 2) and so has been consulted throughout the preparation of the Application.

1.3 Description of the Scheme

1.3.1 The Scheme involves the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generation facility with a capacity exceeding 50 megawatts (MW) and associated development. It will connect to the National Grid either at the Existing National Grid Thorpe Marsh Substation or via the Grid Connection Line Drop with both options including necessary associated infrastructure. Since the proposed generating capacity surpasses 50 MW, the Scheme is classified as a Nationally Significant Infrastructure Project (NSIP), requiring consent through a DCO under the Planning Act 2008 (Ref. 1). Further details on the Scheme can be found in **Volume I, Chapter 2: The Scheme [APP-053]** of the Environmental Statement (ES).

1.4 Format of Document and Terminology

- 1.4.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Scheme.
- 1.4.2 Section 3 summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'.
- 1.4.3 These terms are used as follows:
 - a. 'Agreed' indicates where the issue has been resolved;
 - b. 'Under discussion' indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties; and
 - c. 'Not Agreed' indicates a final position where the Parties have agreed to disagree.
- 1.4.4 Abbreviations used within the SoCG are provided in Section 5.

2. Record of Engagement

2.1.1 Table 2-1 below sets out a summary of the meetings and correspondence between the Parties in relation to the Scheme.

Table 2-1: Schedule of Meetings and Correspondence

Date	Form of correspondence and attendees	Summary of topics discussed and outcomes
2 November 2023	Email/Letter	SYFRS provided the Applicant with guidance and recommendations relating to FRS vehicle access, provision of firewater, and provision of information which will assist the FRS in the event of an emergency at the Battery Energy Storage System (BESS) Area.
30 January 2024	Meeting/Email	Meeting at Askern Fire Station to discuss all safety aspects for the Fenwick site, no issues of concern were raised during the meeting. The Applicant emailed a range of follow up BESS safety materials which were discussed during the meeting.
15 November 2024	Email	The Applicant informed SYFRS of the submission of the Application, provided links to key documents submitted, and requested a meeting to discuss the Scheme further.
23 January 2025	Meeting (Microsoft Teams)/Email	The Applicant provided an update on the Scheme, including the proposed site design and fire and rescue service accesses and Framework Battery Safety Management Plan (BSMP) [APP-205] submitted as part of the Application, as well as the upcoming revisions to the National Fire Chiefs Council (NFCC) guidance and its relevance to the Scheme. The Applicant followed up on the meeting with links to key documents submitted as part of the Application and provided information and contacts requested by SYFRS for their Relevant Representations.
15 April 2025	Meeting (Microsoft Teams)	The Applicant and SYFRS discussed their Relevant Representation responses and SoCG.
29 May 2025	<u>Email</u>	SYFRS confirmed that their comments regarding the Scheme have been appropriately addressed by the Applicant, however, that they would not be signing this SoCG.

3. Areas of Discussion Between the Parties

3.1.1 Table 3-1 below details the areas of discussion and matters that are agreed, under discussion and not agreed between the Parties.

Table 3-1: Areas of Discussion with South Yorkshire Fire and Rescue Service

Ref	Relevant Application Document	Summary of Description of Matter	Current Position of South Yorkshire Fire and Rescue Service	Current Position of the Applicant	Status
1	Framework BSMP	Consideration of appropriate guidance in the development of the Scheme design.	SYFRS advises that the Applicant should adhere to guidance in the following documents as part of the design process:	The Applicant can confirm that all SYFRS referenced documents were considered during the drafting of the Framework BSMP [APP-205] and to inform illustrative site design plans. The Applicant understands that SYFRS is in agreement on this matter.	Agreed
			 NFCC Grid Battery Energy Storage Systems Planning – Guidance for FRS; 		
			 National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems; and 		
			 FM Global Property Loss Prevention Data Sheets 5- 33, as revised January 2024. 		
2	Framework BSMP	Design of access roads for firefighting appliances and emergencies.	SYFRS has noted that BESS fires may require the use of multiple high reach appliance. Accesses should support the weight of these appliances, as well as provide sufficient distance from the BESS and existing overhead lines to safeguard fire crews from electrical currents. At least two separate emergency access routes are provided to ensure plumes can be avoided, in accordance with NFCC guidance. These should be sufficient to support the width and weight of all SYFRS appliances and appropriate turning points should also be provided. SYFRS note that these matters have been incorporated into the design of the Scheme.	The Applicant confirms that the BESS Area is not located under overhead power lines and sufficient distance is provided to avoid risks to personnel using high reach appliances. Fire management protocols will be included in the Emergency Response Plan (ERP) which prioritise safety and functionality. The Applicant notes that the use of lance or stinger devices is not supported due to explosion risks and will consider automatic and dry pipe suppression systems. Two access points to the BESS Area have been provided to allow flexibility for emergency services. The access track is suitable for all SYFRS appliances, designed to support their weight and have a width of 8 m which will be maintained over the lifetime of the Scheme. There are no dead-end routes within the Order limits The Applicant understands that SYFRS is in agreement on this matter.	Agreed
3	Framework BSMP	Mitigation measures for fire suppression (Row 4, 5, 6)	SYFRS highlight the importance of having a higher-than- average volume of water to control BESS fires. They note the provision of hydrants and water tanks which form part of the design but highlight that additional supplies of water are expected to be within 90 m of the BESS To restrict fire spread, there should be sufficient separation between BESS containers, the use fire- resistant materials, and consideration regarding	The Applicant confirms in Section 3.2 of the Framework BSMP [APP-205] that four pressurized water tanks, supplying 720,000 to 976,000 litres of water, are provided to manage fires in the BESS Area. It is acknowledged that water supply should be no more than 90 m from the BESS Area and, as detailed in Paragraph 3.2.5 of the Framework BSMP [APP-205] , the BESS Area integrates firewater capture to prevent potential contamination.	Agreed

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Ref	Relevant Application Document	Summary of Description of Matter	Current Position of South Yorkshire Fire and Rescue Service	Current Position of the Applicant	Status
			automatic suppression systems to prevent the spread of fire. The Emergency Response Plan (ERP) should be developed on the basis that fire will not spread with fire and rescue operations limited to monitoring the BESS involved and cooling those surrounding them. Safety measures such as external warnings, blast walls, and remote activation of suppression systems are vital to protect responders and limit fire spread. Based on NFPA 855, it is recommended that a minimum distance of 30 m is incorporated prior to any mitigation.	The Applicant's Framework BSMP [APP-205] incorporates key NFCC guidelines and NFPA 855 recommendations to minimize fire risks in BESS areas. Equipment spacing and fire suppression systems are designed to limit fire events to a single BESS Container. Automatic suppression systems, if required, would conform to NFPA 855 and tested to UL 9540A standards. An independent Fire Protection Engineer will validate the suppression system design. The Framework BSMP [APP-205] ensures high protection against fire and explosion risks with signage and the ERP detailing alert procedures, communication capabilities, and warning systems. Fire and gas detection equipment will comply with NFPA standards, and final specifications will be agreed upon with SYFRS at the detailed design stage. The Applicant understands that SYFRS is in agreement on this matter.	
4	Framework BSMP Volume III, Appendix 9-4: Framework Drainage Strategy	Consideration regarding the environmental impact of a potential BESS fire.	SYFRS expressed concern that BESS fires can significantly harm the local environment and recommend developing a plan to guide discussions regarding the suitability of the location of the BESS Area. This should identify all sensitive receptors within a 1 km radius of the BESS Area for appropriate emergency planning.	The Applicant confirms they are engaging with the Environment Agency regarding the environmental impact and mitigation measures relating to the BESS Area. As outlined in the Framework BSMP [APP-205] , a site-specific plume analysis study will be conducted once the specific battery technology to be used for the Scheme is confirmed. This will be in accordance with the latest NFCC guidelines and assess the potential environmental impacts of a BESS fire on sensitive receptors within 1 km. It will consider toxic gas emissions and particulate matter in the context of Public Health England (PHE) guidelines. It should be noted that Volume III , Appendix 9-4: Framework Drainage Strategy [APP-160] also includes details regarding the management of firewater to prevent impacts to sensitive receptors from contamination. The Applicant understands that SYFRS is in agreement on this matter.	Agreed
5	Framework BSMP	Management plans for potential incidents within the BESS Area.	It is noted that emergency plans should be developed and shared with SYFRS. This includes a Risk Management Plan (RMP), ERP, and Post Incident Recovery Plan (PIRP). They also request that a direct, 24-hour contact number for the Scheme is provided and that Site Specific Risk Information (SSRI) is provided prior to the operation and maintenance phase to allow SYFRS to familiarise themselves with the Scheme.	The Applicant confirms their commitment to developing a RMP and ERP which will be aligned with NFCC guidance, as detailed in Paragraphs 3.5.7 and 3.5.5 of the Framework BSMP [APP-205] . A PIRP will also be developed to address potential reignition of the BESS, de-energizing the system, and removal and disposal of damaged equipment, as detailed in Paragraph 3.5.6 of the Framework BSMP [APP-205] .	Agreed

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Ref	Relevant Application Document	Summary of Description of Matter	Current Position of South Yorkshire Fire and Rescue Service	Current Position of the Applicant	Status
				The Applicant also confirms that a direct 24-hour contact number will be provided to SYFRS and that a display of 24/7 Emergency Contact Information signage will be available within the BESS Area. All SSRI information will be made available and agreed with SYFRS prior to operation and maintenance commencing, as detailed in Paragraph 3.5.4 of the Framework BSMP [APP-205] . The Applicant understands that SYFRS is in agreement on this matter.	

4. References

- Ref. 1 Planning Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents. [Accessed 6 February 2025].
- Ref. 2 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Available at: https://www.legislation.gov.uk/uksi/2009/2264/contents/made. [Accessed 6 February 2025].

5. Abbreviations

Abbreviation/Term	Definition
SoCG	Statement of Common Ground
DCO	Development Consent Order
FRS	Fire and Rescue Service
NFCC	National Fire Chiefs Council
NFPA	National Fire Protection Association
BESS	Battery Energy Storage System
ERP	Emergency Response Plan
СТМР	Construction Traffic Management Plan
SYFRS	South Yorkshire Fire and Rescue Service
NSIP	Nationally Significant Infrastructure Project
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
PHE	Public Health England
PM	Particulate Matter
SME	Subject Matter Expert
SSRI	Site Specific Risk Information

Fenwick Solar Farm Document Refefence: <u>EN010152/APP/X.X</u> <u>EN010152/APP/8.11</u>

Appendix A Email from SYFRS to the Applicant confirming agreement with this SoCG

From: @syfire.gov.uk>

Sent: <u>29 May 2025</u> 16:21

To: ; Stn 10 WM Retained

Cc:

Subject: RE: Fenwick Solar Farm - South Yorkshire Fire and Rescue Service SoCG

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Hi

Following discussion with our Governance Manager and from consultation with NFCC fire engineer and colleagues at other Fire and Rescue Services, we have taken the position to not sign a statement of common ground at this stage.

While the document addresses directly the pre-consultation comments raised, SYFR do not want to endorse or side an opinion on the site proposal. SYFR consult on these planning proposals to ensure suitable access and facilities for firefighting in the event of an emergency and provide comments to the planning authority / planning inspectorate for an informed decision to be made.

Comments to the Examining Authority's fire written questions will be made and any further consultation reviewed and representation where appropriate made.

Kind Regards,

Business Fire Safety South Yorkshire Fire & Rescue