

Confirm that the proposed BESS design includes sufficient control/mitigation measures, to ensure that the hazard from water containing harmful chemicals (e.g. produced in a BESS fire) would not contaminate the underlying sensitive aquifer. This risk has been identified in an Energy Institute document:-

'Many BESS systems are being proposed for sensitive sites, including source protection zones where ground water finds its way into aquifers. The risks of contamination from BESS fires, which are not uncommon, can have extreme consequences. Concentration of BESS, for which there are no safety guidelines or regulations, into facilities of 1–2 GWh of storage present a hazard that requires levels of care in siting and management that are currently absent or untested.'

Reference: Energy Institute's New Energy World article 'Grid-scale solar PV - an upside down policy' dated 26/11/2025. [https://knowledge.energyinst.org/new-energy-world/article?id=139982&fbclid=IwDGRleAOUEIpleHRuA2FibQIxMQBzcnRjBmFwcF9pZAo2Njl4NTY4Mzc5AAEeNExVn7\\_GezrFk2DlbHYLjZynu0-cowziVtruMi2pBf0B6fSbVfYuzVANpvM\\_aem\\_IRguyzK30ldJv4Q6uy2kmA&brid=LGjzA060u5k5GW7wGPiaJA](https://knowledge.energyinst.org/new-energy-world/article?id=139982&fbclid=IwDGRleAOUEIpleHRuA2FibQIxMQBzcnRjBmFwcF9pZAo2Njl4NTY4Mzc5AAEeNExVn7_GezrFk2DlbHYLjZynu0-cowziVtruMi2pBf0B6fSbVfYuzVANpvM_aem_IRguyzK30ldJv4Q6uy2kmA&brid=LGjzA060u5k5GW7wGPiaJA)

Confirm that the proposed BESS design will satisfy the fire water requirements stated in NFCC Guidance:-

‘As a minimum, it is recommended that hydrant supplies for boundary cooling purposes should be located close to BESS containers (but considering safe access in the event of a fire) and should be capable of delivering no less than 1,900 litres per minute for at least 2 hours. Fire and rescue services may wish to increase this requirement dependant on location and their ability to bring supplementary supplies to site in a timely fashion.’

Reference Grid Scale Battery Energy Storage System planning - Guidance for Fire and Rescue Services, National Fire Chiefs' Council, November 2022, <https://nfcc.org.uk/wp-content/uploads/2023/10/Grid-Scale-Battery-Energy-Storage-System-planning-Guidance-for-FRS.pdf>

Please confirm that competent persons have carried out dispersion modelling for all BESS container vents (including from HVAC atmospheric vents, deflagration explosion vents and battery container open doors), and that this demonstrates that all release scenarios (including battery fire plume fallout) would achieve acceptable dispersion risk reduction from harmful chemicals impacting people and the environment.

The proposed BESS locations are close to local villages, residential properties and schools, e.g. 0.8 miles from Long Riston school and 1.2 miles from Leven school. These locations do not meet the exclusion zone separation buffer distances stated in Section 2 of the attached BESS Standards document (produced by fire safety consultant Park Lodge International):-

#### Section 2 Placement and Spacing of BESS Units

##### \* - Exclusion Zones:

- No unit shall be sited within 5 miles of a town or village.
- A minimum distance of 1 mile shall be maintained from any residential property.
- A buffer of 10 miles shall be observed from any school, educational institution, or medical facility.

Reference

