

From: [REDACTED]
To: [Pearmtree Hill Solar Farm](#)
Subject: Fw: Submission on BESS safety ahead of Deadline 6
Date: 18 December 2025 18:07:30

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From: " [REDACTED]"
To: "Pearmtree Hill Solar Farm"
Cc: [REDACTED]
Sent: Mon, 15 Dec 2025 at 14:59
Subject: Submission on BESS safety ahead of Deadline 6

SUBMISSION

Members of the public have serious concerns with regard to BESS safety.

Will the applicant please provide satisfactory answers to the following questions.

1. Separation distances

At the Issue specific hearing on 11th December, the applicant stated that new guidance had been issued relating to fire safety earlier this year. He suggested that the advised separation distance of 6metres might be reduced to as little as 1.5metres. Can he please provide a link to this updated guidance?

For reference see: National Fire Chief Council Grid Scale BESS Planning Guidance
<https://drive.google.com/file/d/1qMI8WUU2e3oJZLRaDENkB6lc5nvQyKou/view>

2. Water supply in the event of fire.

At the same meeting the applicant was asked whether adequate water provision would be available in accordance with the guidance? He did not answer this question stating that water wouldn't be used to put out a fire. Nobody disputes this. The issue is about containment to the BESS in thermal runaway, by applying cooling water onto adjacent BESS containers, to reduce the risk of fire spreading. Can he please answer the question. Will hydrant supplies be available to deliver, for boundary cooling purposes, the recommended minimum of 1,900 litres per minute for at least 2 hours?

3. Emergency access/egress.

The applicant is required to provide at least 2 suitable alternative emergency access points as the BESS locations are in flood zones. Will the applicant provide these?

4. Venting of harmful substances including Hydrogen Fluoride.

On 11th December the applicant stated that a dispersion distance of 25 to 30 metres would reduce the harmful level of Hydrogen Fluoride. However by using the dispersion methodology in BS60079 Part 10 together with the data in the Hazard Assessment document referenced below, then a distance of 2,200 metres is required to reduce the level of HF to 1 part per million., as indicated in the attached table and graph.

Can the applicant clarify?

5. Sealed Battery Drainage System.

At the meeting of 11th December it was highlighted that the Environment Agency have serious concerns with potential of harmful substances into the sub soil. This was dismissed by the applicant. How will the applicant address this?

For reference see: Hazard Assessment of Battery Energy Storage System
[https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010106-003806-DL2%20-%20Alan%20B%20Smith%20-%20Appendix%206%20\(2%20of%202\)%20-%20Academic%20Reports.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010106-003806-DL2%20-%20Alan%20B%20Smith%20-%20Appendix%206%20(2%20of%202)%20-%20Academic%20Reports.pdf)

[REDACTED] on behalf of
ERASE-East Riding Against Solar Expansion
<http://www.erase.org.uk>
[REDACTED]