

**From:** [Mike Holstead](#)  
**To:** [Lime Down Solar](#)  
**Cc:** [Stop Lime Down](#)  
**Subject:** EN010168 Lime Down Solar Project OFH1 Tuesday 21st April 2026  
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From: **Michael Holstead Speaker No 13 (Interested Party Ref: [REDACTED])**.

For your reference please find below the content of my oral representation made at the subject hearing.

*"Good afternoon, my name is Michael Holstead, I'm a Chartered Engineer and a resident of Corston and I'm completely opposed to the proposed Lime Down Solar Factory. While there are many aspects that concern me, I will highlight two:-*

***Firstly the safety provisions for the BESS:***

*The proposal states there will be firefighting storage tanks containing 456 thousand litres capable of delivering 1900 litres per minute for 240 mins, and that the firewater run-off will be contained and tested before release, or if necessary removed by tanker and treated offsite.*

*The Boulder City BESS Fire in September 2025 required up to 5678 litres per minute; at that rate there is only 80 minutes of stored water. Each BESS container has the same capacity as 67 Tesla Model Y's and one large EV incident can consume 136,000 litres over many hours, 67 happening at once would require over 9 million litres. And there are 270 containers onsite in close proximity. My questions for the EA:*

- i) To what extent do the estimates for on site firefighting water, its run-off and containment accommodate a credible worst case?*
- ii) Has the impact of Forever Chemicals contaminating the underlying aquifer being fully considered?*
- iii) Do the bunding and tankering arrangements secure the Best Practicable Environmental Outcome for drinking water supplies?*
- iv) Has the risk of a catastrophic failure in one container causing adjacent containers to fail been adequately assessed and mitigated?*

***Secondly the overarching Risk Assessments:***

*Three Mile Island, 9/11, London Bridge attack, Porth Wen storm damage (2024) and the Cirencester BESS fire (March 2025) – none of these were supposed to happen, but they did.*

*The railway has 4 or 5 trains an hour pass adjacent the BESS exposing a large number of people to risk of harm in the event of an incident. The risk associated with terrorism has been dismissed as “unlikely to be a target ...”. Given the BESS is a soft target containing all the necessary material for a malevolent actor to create a major incident, the assessment is incredible and incoherent with Government policy to provide Security for the British People in a Dangerous World. My last questions of the EA are:-*

*i) Has a credible Cyber Risk assessment been conducted of Sungrow and the rest of the supply chain?*

*ii) LOW Probability HIGH Impact risks or ‘Black Swans’ do materialise and when they do, the impact is often disastrous; is the hazard analysis, the probabilities of occurrence and the severity of impact robust enough to support the residual risk being assessed As Low As Reasonably Practicable?*

*Thank you for your attention."*