

From: Tom Clark <Tom.Clark@notts-fire.gov.uk>
Sent: 08 March 2024 12:56
To: PlanningAndGrowth Email
Cc: [REDACTED]
Subject: [EXTERNAL]:FAO Emily Dodd - 24/00161/FUL - Land West Of Bradmore Road And North Of Wysall Road Land West Of Wysall Wysall
Attachments: ufm2_Consultee_Notification.pdf; Grid Scale Battery Energy Storage System planning Guidance for FRS.pdf; OUTLINE_BATTERY_SAFETY_MANAGEMENT_PLAN-1799489 NFRS Comments.pdf

[REDACTED]

Dear Emily,

Please find the comments of the Fire Authority in relation to the above consultation.

- 1) Comments have been added to the Outline Battery Safety Management Plan (OBSMP), the overarching flavour here is the promise of further precise detail to follow by the developers. With the detail supplied to date it is insufficient to consult comprehensively, however the Fire Authority recognises that this detail is intended to be provided and available to consult on once the final technology to be used is known. As such a pre-commencement condition would be applicable and enforced by the LPA.
- 2) Attached is the NFCC guidance document which as a starting point will form the basis of our concerns to address. It is referenced in the OBSMP by the developers however it is attached for completeness. Some (not all) of the matters within the document are also cited within the comments on the OBSMP.
A sample of examples are:
 - a. Can Fire Service vehicles easily access all of the site, SWEPT path analysis undertaken
 - b. Construction of the containers, what final safety systems will they have, final internal suppression system to be used, method of dealing with a fire (extinguish or controlled burn), deflagration devices,
 - c. Container spacings between each other, heat output (energy density) if involved in fire to justify the suggested spacings
 - d. Contamination levels of gases and vapour, how will it be controlled, vented
- 3) Any buildings that form part of the development will be subject to Building Regs / Approved Document B and furthermore could be within the scope of the Regulatory Reform (Fire Safety) Order 2005.
- 4) NFRS is aware that the 'industry' has moved from extinguishment for fire incidents involving BESS containers, to 'burn out' and protect. This is based on advice from industry leading experts. NFRS seeks to clarify that the relevant enforcing authority for the protection of the environment (for example Environment Agency / Environmental Health / UK Health Security Agency) should be consulted. The relevance being that if this approach is not approved by that enforcing body, this may influence any subsequent Risk Management and Emergency Response Plan detailing the requisite safety provisions expected for the site.

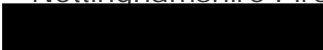
Whilst it (NFRS) does recognise burn out as a means to resolve an emergency of this type on site, it is not the role of the Fire Authority to authorise it.
- 5) Should the scope of the scheme change the Fire Authority reserve the right to comment further.

It will be the expectation of the public that should an incident occur, the Fire Service will attend and resolve it. It is the expectation of the Fire Authority therefore that all steps should be taken to mitigate such an incident, and if one does occur we are given every possible circumstance to do so safely, efficiently and effectively.

Thank you.

Regards

Tom

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