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For the attention of Ms L Wells
Havant Borough Council
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PO9 2AX

Date:	14 July 2025	My Reference:	F6/JL/00840502
Enquiries To:	Jonathon Lambert	Your Reference:	APP/25/00351

Dear Ms L Wells

Town & Country Planning Act 1990
Fire and Rescue Services Act 2004
Planning Application Number: APP/25/00351
Address: Bedhampton Pumping Station, Meyrick Road, Havant

HIWFRS understands that the project involves: Development of a Battery Energy Storage System and associated infrastructure.

I confirm that Hampshire & IOW Fire and Rescue Service (HIWFRS) has received your application, dated 15 May 2025. The inspector named above has considered the information provided and has made the following comments.

Fire and Rescue Services Act 2004

N.B. The following recommendations are advisory only and do not form part of any current legal requirement of this Authority.

HIWFRS has now reviewed the information provided and is of the opinion that insufficient information is currently in place to demonstrate the suitability of the proposals in terms of both fire safety and firefighter access.

Your attention is drawn to the “Grid Scale Battery Energy Storage System Planning” guidance produced by NFCC for such applications.
This guidance forms the basis for our response to any BESS application as it provides clear and concise information on what should be in place and the reasoning behind such

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requests. A copy of this guidance can be reviewed via the link to NFCC Knowledge Base below:
https://nfcc.org.uk/knowledge-base/page/3/

It is noted that this guidance asks for information over and above the level of detail that would typically be expected at planning stage. The reasoning for this is that once planning permission is granted to BESS sites there are very few fire safety regulations that will apply to the site. It is therefore important to ensure all safety matters are identified and set out as part of the planning process.

HIWFRS is of the opinion that further consideration needs to be given to the following matters before a decision can be made:

Access Conditions

1. The site layout does not include a perimeter access road allowing access to the whole site from multiple directions. The lack of such provision may hamper the ability of attending fire crews to engage in firefighting activities on-site.

   It is also observed that the site plan includes a dead-end access condition at the south of the site, this may further impact manoeuvrability within the site.

Spacing and Separation

2. The guidance produced by NFCC requests a minimum of 10m separation between the BESS units and any combustible vegetation to reduce the risk of this vegetation becoming involved in fire. This does not appear to have been achieved in this case.

   It is also observed that several BESS units are within 4m of the site boundary. Due to the separation distance, it is strongly recommended that a thermal radiation study is undertaken to ensure that fire cannot spread beyond the site boundary.

Water Supplies and Management

3. The information provided does not consider how the run-off of large volumes of potentially contaminated firefighting water will be managed.

   While a controlled burn approach is intended to be adopted, boundary cooling at a site level may still be required subject to a dynamic risk assessment. This may entail some water falling within the site.

   It is therefore recommended that reasonable measures are taken to manage any water that does fall within the site boundary.

Active Fire Protection Systems

4. It is stated that an aerosol-based fire suppression system will be installed. Many similar systems are reliant on limited air movement within the enclosed space.

While suppression systems within BESS units can prevent or extinguish a fire, it is HIWFRS understanding that these systems do not resolve the thermal runaway event that is occurring within the battery unit itself. This is a chemical reaction that may continue to produce large volumes of flammable gas regardless of whether or not a fire has been suppressed. Suppression systems are therefore required to work in conjunction with ventilation systems to allow gases to escape the BESS enclosure without impacting the performance of the suppression system.

The applicant should confirm that the operation of any ventilation (such as deflagration venting and explosion protection systems) will not negatively impact the operation of the suppression system.

Battery Safety Management Plan (BSMP) and Chemistry

5. The BSMP states that the proposed units have undergone UL9540A testing at the module level. HIWFRS does not consider it to be sufficient to state that such testing has been carried out without providing certification.

   HIWFRS strongly recommends that testing certification is provided in support of the application.

It is noted that some information, including UL9540A testing data and interactions between active fire safety systems (i.e. suppression and deflagration prevention systems) may not be available to the applicant until a supplier has been appointed. In the absence of this information, HIWFRS would request that a further opportunity be given to analyse this information at a later stage. This can be achieved through the implementation of a suitably worded planning condition. HIWFRS recommends the use of planning conditions similar in form and content to the following:

Example planning condition provided to HIWFRS by a Local Planning Authority:
"Development of the battery storage compound shall not commence until details relating to the fire safety arrangements of battery systems in the form of a Battery Safety Management Plan are submitted to and approved in writing by the Local Planning Authority. The Plan shall include:

Fire safety measures for emergency personnel attending a fire incident, such as deflagration vents (including installation of an audible fire alarm on the site)
A comprehensive review of the space between units in line with the UL9540A testing information to establish whether there is potential for fire to spread between units
A review of the detailed battery safety management plan and any associated fire safety systems
Details of the proposed battery chemistry
Details setting out how firewater used during fire suppression would be contained on site or drained safely away from the designated site to the south of the Battery Energy Storage Facility

The proposals must be implemented as approved.

Reason: To protect adjoining land and habitats from increased fire risk associated with the proposed development.

Firefighting and the Environment

Should a serious unsuppressed fire occur on the site, the water environment may become polluted with 'fire water run-off' that may include foam. The Service will liaise with the appropriate authorities at any incident where they are in attendance and under certain circumstances, where there is a serious risk to the environment, a 'controlled burn' may take place. This of course could lead to the total loss of the site contents.

Premises' occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages.

Please quote our reference number on all correspondence.

Yours Sincerely

Neil Odin
Chief Officer

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