

The Faversham Society

CHSP Examination

Submission to Issue Specific Hearing on the Development Consent Order 18 July 2019

1. We have a number of concerns about the content of the DCO and about how compliance will be assured.
2. We have concerns about the limitations of the Rochdale Envelope about hazards associated with emerging battery technology. The application lacks detail on the battery technology to be installed. Li-ion batteries are potentially hazardous.
3. It is not clear from the developer's plans how the Fire Service would secure access to the battery storage area or effectively fight a fire within the compound, remembering that the compound is comparable in size to the Faversham recreation ground. We believe that the DCO should require the specification of all access routes.
4. It is not clear what discussions have taken place between the Kent Fire and Rescue Service (KFRS) and the developer. KFRS have pointed out to us that "all risk reduction strategies start with prevention and it is the 'responsible person' for the premises that has responsibility for this as stated in the Regulatory Reform (Fire Safety) Order 2005." There is very little in the application to assure that this has competently been done, nor what site-specific information will be provided to KFRS.
5. KFRS informs us that: "*In broad terms and prior to a decision relating to any on-site fire suppression systems, KFRS would extinguish a fire on the site by applying large volumes of water. Alternatively, if no life risk were present, then a controlled burn strategy may be considered and employed in order to try to minimise the possible environmental pollution that may be caused with fire water run-off.*" It seems reasonable to assume from this that there has been no discussion between the developer and KFRS. Is this acceptable when a new emerging and potentially very hazardous technology is proposed?
6. There is no acknowledgement or proposed mitigation measures for the risk of a small fire spreading to other cells and becoming catastrophic with highly toxic emissions of Hydrogen Fluoride gas from burning Li-ion batteries in the air over Faversham or Graveney?
7. We believe that the DCO should ensure that the batteries installed are subject to effective and enforceable regulation by an appropriate public authority.
8. We also have concerns about the effective enforcement of any specification in the DCO on the numbers and timings of traffic movements. Who will be responsible for enforcing the traffic movement permissions? Do they have the capability and capacity to effectively enforce the DCO?

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