

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Cc: [REDACTED]
Subject: Deadline 6 - Battery Safety
Date: 03 October 2019 13:15:44
Attachments: [REDACTED]

Dear Hefin,

Please find attached GREAT's response on battery safety following the Environmental Matters hearing on 11 September 2019.

Kind regards,

Marie

3 October 2019

National Infrastructure Planning
Cleve Hill Solar Park

BY EMAIL

Deadline 6 – Battery Safety

Dear Hefin,

On behalf of GREAT, I wish to express our concern at the Applicant's approach to providing some assurance about the safety of the proposed battery storage installation at the Cleve Hill development.

Our concerns include:

1. Mr Phillips gave a comprehensive explanation about the presence of Leclanché at the DCO Hearing on 10 September, which included reference to the fact that the Applicant had *"reached out to them, along with a number of other providers, to see if someone was willing to come and participate in this hearing to try and deal with some of the issues that have been raised over battery safety"* and *"Leclanché will be here as a recognised battery expert and are not part of the applicant team. They are not procured, contracted or retained by us in any way."* However, despite stating twice that he would repeat this at the start of the Environmental Matters hearing on 11 September, however he gave only a very brief introduction saying they are *"sat with the Applicant for convenience so that I may assist them but they are at the hearing in an independent capacity"*. We do not believe a company who was clearly contracted to attend the hearing can possibly be independent. Nor do we believe it was necessary for them to sit with the Applicant – if they are experts and are there to talk about safety we do not feel that Mr Phillips should be helping them in any way.
2. We are also very confused about the assertions made by Mr Phillips about the lack of contract with Leclanché. An article in the Faversham News (<https://www.kentonline.co.uk/faversham/news/the-air-could-fill-with-toxic-gas-as-far-as-six-miles-away-210622/>), published on 18 August 2019, included the following statements:

Cleve Hill Solar Park Ltd says it is working on the battery storage plans with Swiss firm, Leclanché SA - a world leader in the industry. A spokesman said: "Both the developers and the Swiss battery specialist put the safety of communities and their workforce at the heart of their designs and believe it is absolutely right to be =[-;p] scrutinised on the safety of the development. Cleve Hill Solar Park Ltd and Leclanché

are designing an Outline Safety Management Plan which will be consulted on with the Kent Fire and Rescue Department and further assessed by the Planning Inspectorate as part of the ongoing examination for the scheme.”

This suggests that Leclanché is contracted to the Applicant in some capacity and is yet another example of the Applicant's disingenuousness. We ask them to be honest and transparent about their plans in this regard.

3. The reason for our concerns about battery safety is partly because the Applicant has not yet confirmed who is going to be responsible for installing the energy storage element. We are sure Leclanché is very good and that they do indeed exercise all the safety controls that they spoke about. However, they are not contracted to do the work (according to Mr Phillips) so we do not believe their assurances can be relied upon. As Leclanché made it clear in their answers to the ExA, *“international safety standards are becoming more the norm”*, so are not the norm yet. As a result, the safety of the installation will heavily rely on the standards of the company contracted to do the work.
4. Another concern is the sheer size of the energy storage compound at 700 MW hours. Although Leclanché clearly have a lot of experience, the largest storage development they have is 48 MW hours, just 7% of the size of Cleve Hill. Despite Leclanché's assertions that they don't see it as this size, the fact is that it is, and there are no other examples in the world of such a large energy storage development. We therefore have no experience to go on with regards to its safety or other problems that may become apparent only when it's built. We do not believe Cleve Hill is the right location for such a large 'pilot' scheme.
5. Hive Energy recently announced its formation of a consortium with Immersa Ltd to “jointly build and develop Solar & Storage projects at a grid scale level to offer green peaking power and reserve power capacity” (<http://www.hiveenergy.co.uk/hive-backs-long-duration-storage-with-immersa-cellcube-partnership/>) This new offering is driven by the relatively new product generation of CellCube's Vanadium Redox-Flow Battery system. As stated in previous comments by Dr Erasin and Professor Sir David Melville, these batteries are not considered to be as safe as the Lithium-ion batteries. It is questionable why a developer, i.e. Hive, would not use their own consortium to supply and install the battery storage element so our concern is that this will be the intention of the Applicant if planning approval is given. Again, we ask the Applicant to be honest and transparent about their plans in this regard.

We ask that this application is refused.

Regards,

Marie King
On Behalf of GREAT
Graveney Rural Environment Action Team