

The safety and viability of the project in relation to the Battery Energy Storage System (BESS) and the request of the applicant for carte blanche to change the mix of the project as long as there is a minimum of 50MW of solar generation

1. The applicant from its Companies House registered data has no financial filings giving a trading history or evidence of the substance required for such a project. It presumably claims substance through its owners Tribus Energy (also no trading history) and PS Renewables (have historic filings). But PS Renewables on its website mentions 255MW of UK solar delivered over 24 projects (on average about 1/50th of the scale of this project) none of which include BESS. The applicant hence apparently neither has the financial substance nor the technical experience required. Although the ultimate owner is Solaer Holdings, which is more substantial financially and quoted by the applicant as having globally delivered 1.5GW in 200 projects - these are still very small projects in relation to the Sunnica proposal and so do not show the experience required (no reported BESS in any of them). Financially the annual revenues reported are around £60M and profits about £6M - these are still quite small relative to the estimated costs of the project quoted by Sunnica of £600M and the limited financial substance significantly increases the risk that the project might not be delivered if unexpected problems were to occur. Moreover, the financial structure through local holding companies mean that if the project went seriously adversely wrong, the local companies such as Sunnica, could be wound up leaving the UK Government with the costs of completion of the project or restoration of the land. At the very least, were the project allowed to go ahead, the Secretary of State should require the posting of a bond at the outset of the project of value at least the costs to restore the land to its pre-project condition in the event of the supplier's default.

2. There is a significant history of major accidents with grid scale battery energy storage system, mainly fires caused by thermal runaways in the US, Australia, South Korea etc - some of which have taken days to suppress. These fires have caused loss of life to firefighters and adequate standards do not yet exist for the safe design and installation of such systems. These fires also cause dangerous pollution from the materials used in the battery that presents a risk to population living nearby. Failure rates of 2% are quoted in the literature - which if correct means that a fire over the lifetime of the project (even multiple fires) are bordering inevitable. The applicant in their submission has shown little understanding of these risks (for instance, water capacity of hours to suppress fires that can last days), an initial assessment in their safety plan leaves multiple hazards with high medium risk after their proposed risk mitigation measures. It is normal that multiple independent hazards combine additively so it looks like their own assessment already indicates a high risk for the overall project.

3. The applicants request to have an ability to change the project arbitrarily within the land envelope of the proposal with a minimum 50MW generation shows their lack of understanding of these risks. The project uses a very large land area which would not be justified for only 50MW generation. The fact that they mention such a low minimum, so much less than the capacity of the area published in their plans seems to imply an intent to reduce greatly generation whilst increasing the Battery Energy Storage System. Since their lack of planning on Battery Safety even at its nominal scale gives great concern, the idea that they given be latitude to increase it based likely on increasing the profit of the project without reference to safety or external scrutiny seems wrong.