28 October 2024

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## The Planning Inspector ainspectorate dov uk

## Dear Sir

FURTHER SUBMISSION - DEADLINE 5 NSIP OAKLANDS SOLAR PROJECT OPEN HEARING 22/10/25 - REPRESENTATIONS AS REQUESTED BY THE PLANNING INSPECTOR.

We attended the open hearing on Tuesday 22 October at Branston Golf Club. It is our understanding that our previous written comments have been taken into consideration

We understand that the P I is moved to address additional concerns where they can be evidenced

We wish to record our concerns regarding the size, proximity to villages, and fire / post-fire air pollution risk of the BESS (Battery Energy Storage System).

We cite a battery fire at Orsted BESS, Carnegie Road, Liverpool, L137HY 15th September 2020 (Merseyside Fire and Rescue Services (MFRS) Incident number 018965 – 15092020). m%2Erequest%2Ea copy of the fire incident re 00%2Frespor e%2E2075510%2E 2E5%2ESignif nt%2520Rer ort% 2520Einal% 252 6%2D18um-

The lessons learned concur that MFRS' Operational Risk Information available for responding crews specific to this site and the hazards associated with BESS was **inadequate**. This highlighted an internal gap for effective processing of certain Site-Specific Risk Information (SSRI) and further highlights a broader gap on the awareness and understanding of BESS sites and their inherent fire risks.

The fire caused a significant blast event, with debris being propelled between 6 and 23m from the point of origin. It was concluded that there was a significant risk to emergency responders that caused significant injury to firefighters at fire incidents on international BESS sites.

Due to the nature of the contents, the incident was declared as a fire containing hazardous materials and a Hazardous Materials Environmental Protection Officer (HMEPO) was requested.... Defensive firefighting continued on site for a total of 59 hours.

Please refer to the referenced document for further information

We cite two further examples of two battery fires (at U.S. solar farms).

The CTIF is the international association of fire and rescue services, based in the USA. It reports that a lithium-ion battery fire in a solar farm by Lake Ontario in New York state took four days to extinguish. The fire sparked air quality alerts as large amounts of potentially toxic smoke was affecting the community. It took four days to extinguish. (https://www.ctif.org/news/solar\_farm-lithium-ion-battery-fire-took-four-days-extinguish)

News outlets also report a fire that broke out in East Otay Mesa, a San Diego suburb near the Mexican border in May 2024. It took six days to extinguish and was reported to be still smouldering a further five days later. Evacuation orders and road closures in the area surrounding the storage plant were ordered.

We understand the PI would perhaps prefer more scientific citations, but massive solar farms with battery storage are an emerging concept, and we consider these examples evidence the need for fire and subsequent toxicology considerations for the proposed Oaklands Solar Farm to be fully assessed.

As we understand it, the nearest fire station, Swadlincote, has only two engines. We are unclear whether they have access to a HMEPO.

As the PI will be aware from the information submitted at the open hearing, the roads in the area are narrow, over-exploited, pot-holed, and often overrun with roadworks, not to mention there is difficult access from the A38 given inadequate bridges and lack of commitment to their replacement. (Quite how Derbyshire County Council can state, as we understand they did at a hearing on the subsequent day to the open event, that they have no issues with traffic and further state risks can be mitigated, is beyond anyone living in the area. Earlier this year there were weeks of disruption during which Walton Bridge was closed due to a refuse truck forcing its way across. What would have happened in the event of a major incident is anyone's guess.

It is our view that the PI must be confident that fire and police authorities have been fully consulted and that the authorities should be required to provide water-tight confirmation of their plans and ability to respond to incidents of any size and nature in the proposed solar farm.

## Additional concerns:

We have further concerns that we cannot provide scientific evidence for, but for the sake of completeness wish to mention:

- The environmental impact of the structures and batteries in both their production, transportation, and post-solar farm disposal.
  The long-term commitment of BayWar.e (i.e. the financial commitments to be held in trust for the long-term needs of the proposed solar farm, especially if BayWar.e either fall into administration or pull out of The project any stage)
   The possibility of panicked animals (including deer) running into the roads, causing both their own injury and car accidents
   The increased traffic and further degeneration of the road network, and the consequent impact on road safety.

Thank you for your consideration

Yours faithfully

Gillian and Paul Holland