

My Ref: Cottam Solar Project/TP
Your Ref: EN010133-001667

For the attention of: Cottam Solar Project Case Team
Sent by email to: CottamSolarProject@planninginspectorate.gov.uk

21.06.2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING CONSULTATION: Application by Cottam Solar Project Limited for an Order Granting Development Consent for the Cottam solar Project

LOCATION: COTTAM SOLAR PROJECT

I refer to the planning application reference EN010133. Due to the nature of this application, the Fire Authority requires that the below items are included within the development. Provided that these requirements are met, the Fire Authority would make no objection to the application.

I. ACCESS

Access for fire appliances and fire fighters must meet with the requirements specified in Building Regulations 2010 (As Amended), Approved Document B, Part B5. These requirements may be satisfied with other equivalent standards relating to access for fire-fighting, in which case those standards should be quoted in correspondence.

II. CARRYING CAPACITY

Lincolnshire Fire and Rescue requires a minimum carrying capacity for hard standing for pumping appliances of 18 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2010 (As Amended), Approved Document B, Part B5. This weight limit would also apply to any private/shared access roads in order to achieve the above item.

If it is not possible to provide access to the proposed development in accordance with the guidance details within Part B5 of Approved Document B, as compensation, Lincolnshire Fire and Rescue may accept the provision, at the developer's expense, of an automatic sprinkler system, designed, fitted and maintained in accordance with the relevant sections of BS5306/BSEN12845:2004.

Should this option be considered, our Fire Safety advisers must be provided with detailed plans of the proposed sprinkler installation. Any scheme proposed should not be of a lesser standard than any provision as may be required by the Building Regulations.

III. WATER SUPPLY

Lincolnshire Fire & Rescue requires an adequate provision of water supply for firefighting purposes in respect of this planning application in accordance with the guidance set out in Approved Document B, Part B5, Section 16 “Fire mains and hydrants”.

In accordance with this guidance, Lincolnshire Fire and Rescue recommends the suitable provision of fire hydrants to be provided at the developer’s expense or an alternative supply of water where appropriate. If fire hydrants are preferred, all hydrants should conform to BS750-2012.

Further guidance on the provision and siting of private fire hydrants is given in BS 9990. Reference should also be given to BS9999:2017 Section 22, ‘Water supplies for fire and rescue service use’. Hydrants should be clearly indicated by a plate, fixed nearby in a conspicuous position, in accordance with BS 3251.

Fire hydrant acceptance testing will be carried out by a Hydrant Inspector on completion and a standard hydrant marker “H” plate will be fitted nearby. Following adoption the Fire Service will be responsible for the ongoing maintenance and repairs for the lifetime of the fire hydrant.

If an alternative supply of water for firefighting purposes is preferred, then this would be accepted subject only to meeting the criteria set out in Approved Document B, Part B5, Section 16. To be accepted, Lincolnshire Fire & Rescue will require suitable evidence detailing the proposal for an alternative supply of water and demonstrating its compliance with relevant guidance.

IV. ENVIRONMENTAL

Bulk storage of highly flammable/explosive/water reactive/toxic substances and any site whereas large scale recycling activities are proposed will need to be specifically consulted with Fire Authority to ensure that the full operational impact, should a fire occur, is assessed and that an adequate provision is recommended.

There are a number of methods available, through which the fire water runoff problem can be addressed, the most obvious being to use a fire suppression system to contain a fire, thus not requiring large volumes of water and containment measures, such as bund walls or drainage systems with lagoons, interceptors, reed beds or treatment plants. It is not for the fire service to stipulate which approach to take, simply to ensure that suitable measures are made a condition of planning approval through a firefighting water run-off strategy.

Battery Energy Storage System (BESS) Requirements

Lincolnshire Fire and Rescue (LFR) recognises the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry the Service would like to work with the developers to better understand any risks that may be posed and develop strategies and procedures to mitigate these risks.

We will work and engage with the developer as the project evolves, to ensure it complies with the statutory responsibilities that we enforce.

The developer should produce a risk reduction strategy (Regulation 38 of the Building Regulations) as the responsible person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005. We would also expect that safety measures and risk mitigation is developed in collaboration with LFR.

The strategy should cover the construction, operational and decommissioning phases of the project.

During the construction phase the number of daily vehicle movements in the local area will significantly increase. The Service will want to view the transport strategy to minimise this impact and prevent an increase in the number of potential road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.

LFR works within the guidance of the National Fire Chief's Council (NFCC) who have been working with several government departments to ensure that fire and rescue services are made aware of any new proposals. NFCC have created a guidance document ([link below](#)) that constitutes LFR's requirements for new BESS development proposals.

[NFCC Grid Scale BESS planning – Guidance for FRS \(nfcc.org.uk\)](https://www.nfcc.org.uk/guidance-grid-scale-bess-planning)

Following the work of NFCC, the Department for Levelling Up, Housing and Communities (DLUHC) has revised its Planning Policy Guidance to include reference to BESS. The guidance is available here: [Renewable and low carbon energy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/renewable-and-low-carbon-energy)

LFR are aware that large scale BESS is a fairly new technology, and as such risks may or may not be captured in current guidance in pursuance of the Building Regulations (as amended) and the Regulatory Reform (Fire Safety) Order 2005. This will highlight challenges the FRS have when responding to Building Regulations consultations. For this reason, we strongly recommend applying the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems.

Failure to comply with the above requirements at planning stage can seriously compromise firefighting operations resulting in unnecessary risk to life, loss of property and unnecessary damage to the environment.

Should you wish to discuss adequacy of access or water supplies to your proposed development, please contact the Community Fire Protection department on 01522 553868.

Yours faithfully



Thomas Patrick

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