

Porter, Karen

From: Nicholas Morris (LFR) <Nicholas.Morris1@lincolnshire.gov.uk>
Sent: 17 February 2025 13:20
To: _planningadvice
Subject: RE: Consultation - H09-0110-25: Land To The East Of Boston Road
Attachments: H09-0110-25 Land To The East Of Boston Road Holbeach_LFR Planning Consultation Response.pdf

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FAO Catherine Sutton

Dear Planning,

Please find attached the Lincolnshire Fire and Rescue Planning Consultation Response for this project.

Apologises for email response but unable to see how to upload the document to the online portal.

Regards,

Nick Morris

Station Manager Fire Protection Manager

Lincolnshire Fire and Rescue

Lincolnshire County Council

Fire & Police Headquarters Deepdale Lane Nettleham

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Advanced notice of out of office / unavailable:

From: planningadvice@sholland.gov.uk <planningadvice@sholland.gov.uk>
Sent: 12 February 2025 16:43
To: LFR Fire Safety <Fire.Safety@lincolnshire.gov.uk>
Subject: Consultation - H09-0110-25: Land To The East Of Boston Road

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PLANNING CONSULTATION

Reference Number: H09-0110-25

Type: SEC 73 MODIFICATION

Proposal: Construction and operation of a micro energy storage facility - approved under H09-0597-24. Modification of Conditions 2 & 3 to allow amendments to previously approved plans

Location: Land To The East Of Boston Road Holbeach

Applicant: AMP Clean Energy

The Council have received the above application and would be pleased to receive any observations you may wish to make. You can make comments by clicking on the link below and using the **Enter Comment** button to leave your observations.

[Click here to view the application](#)

The deadline for submission of comments is **5th March 2025** and please be aware that representations submitted in relation to planning applications will be available for public inspection.

If you need any assistance please contact **Catherine Sutton** who is dealing with this application.

Note:

If this is a Householder Application, in the event of an appeal against a refusal of planning permission, which is to be dealt with on the basis of representations in writing, any representations made about this application will be sent to the Secretary of State and there will be no further opportunity for you to comment at appeal stage.

Ref: H09-0110-25

17/02/2025

Land To The East Of Boston Road Holbeach

To Who it May Concern,

**TOWN AND COUNTRY PLANNING ACT 1990
PLANNING CONSULTATION – NOTES FROM THE FIRE AND RESCUE AUTHORITY**

In order to be successful in firefighting, adequate access to buildings for fire appliances and immediate access to adequate supplies of water, must be provided. The access to, and proximity of, those water supplies directly affects the resources that Fire and Rescue Authorities need to provide in protecting and mitigating their communities from the effects of fire.

Please find below a list of Lincolnshire Fire and Rescue Authority requirements relating to access for fire appliances and firefighting water supplies.

ACCESS

1. Access to buildings for fire appliances and fire fighters must meet with the requirements specified in Building Regulations 2010 Part B5. For small buildings (up to 2000m², with a top occupied storey that is a maximum of 11m above ground level), vehicle access for a pump appliance should be provided to whichever is the less onerous of the following:
 - a. 15% of the perimeter.
 - b. Within 45m of every point of the footprint of the building

For all other buildings, provide vehicle access in accordance with Table 15.1 of Approved Document. These requirements may be satisfied with other equivalent standards relating to access for firefighting.

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 2000 part B5.

2. 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/BS EN12845:2004.

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.

WATER SUPPLIES

3. A building requires additional fire hydrants if both of the following apply.

- a. It has a compartment with an area more than 280m².
- b. It is being erected more than 100m from an existing fire hydrant.

If additional hydrants are required, these should be provided in accordance with the following:

- a. For buildings provided with fire mains – within 90m of dry fire main inlets.
- b. For buildings not provided with fire mains – hydrants should be both of the following:
 - i. Within 90m of an entrance to the building.
 - ii. A maximum of 90m apart.

**All fire hydrants should conform to BS750-2012 Each fire hydrant should be clearly indicated by a plate, fixed nearby in a conspicuous position, in accordance with BS 3251.*

Guidance on aspects of provision and siting of private fire hydrants is given in BS 9990. 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.

4. Where at the time, it is not possible to determine the number of fire hydrants required for firefighting purposes, the requirement should be determined at the water planning stage when site plans have been submitted by the water companies.
5. Where no piped water supply is available, or there is insufficient pressure and flow in the water main, or an alternative arrangement is proposed, the alternative source of supply should be provided in accordance with the following recommendations
 - a. a charged static water tank of at least 45,000 litres capacity; or
 - b. a spring, river, canal or pond capable of providing or storing at least 45,000 litres of water at all times of the year, to which access, space and a hard standing are available for a pumping appliance; or

- c. any other means of providing a water supply for firefighting operations considered appropriate by the fire and rescue authority.

ENVIRONMENTAL

6. 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.
7. 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://nfcc.org.uk)

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)

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

Nick Morris

Station Manager Prevention & Protection
Lincolnshire Fire and Rescue
Lincolnshire County Council
Fire & Police Headquarters Deepdale Lane Nettleham