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**From:** Nicholas Morris (LFR) <Nicholas.Morris1@lincolnshire.gov.uk>  
**Sent:** 05 July 2024 08:47  
**To:** \_planningadvice  
**Subject:** FW: Amendment Consultation: Caudwell Farm Holbeach St Matthews  
**Attachments:** Caudwell Farm Holbeach\_LFR Position Statement\_BESS Non-NSIP.pdf

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Dear Planning,

Apologies but noticed I sent the attached Position Statement which relates more to BESS projects. Please disregard this one. (Tried to recall but this failed).

I have sent a further email with the more suitable reply.

Apologises again for any confusion.

Regards,

Nick Morris

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**From:** Nicholas Morris (LFR)  
**Sent:** Friday, July 5, 2024 8:26 AM  
**To:** planningadvice@sholland.gov.uk  
**Subject:** Amendment Consultation: Caudwell Farm Holbeach St Matthews

Dear Planning,

Having reviewed the Planning Application documents for this project I can see that there was a basic response from Lincolnshire Fire and Rescue provided 14.9.23. However, since then we have been able to bolster our position regarding these project types and hopefully provide more information and guidance. As such, please find attached, to be considered as our response to this amendment.

(Apologises that I have had to respond via email rather than by the "Enter Comment" function from the link below but I do not think there was a way to be able to include attachments?)

Many thanks,

**Nick Morris**

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

☎ **Mob:** 07824625246

✉ **Email:** [Nicholas.Morris1@lincolnshire.gov.uk](mailto:Nicholas.Morris1@lincolnshire.gov.uk)

Website: [www.lincolnshire.gov.uk/lfr](http://www.lincolnshire.gov.uk/lfr)



**Advanced notice of out of office / unavailable:**

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**From:** [planningadvice@sholland.gov.uk](mailto:planningadvice@sholland.gov.uk) <[planningadvice@sholland.gov.uk](mailto:planningadvice@sholland.gov.uk)>

**Sent:** Tuesday, June 18, 2024 9:58 AM

**To:** LFR Fire Safety <[Fire.Safety@lincolnshire.gov.uk](mailto:Fire.Safety@lincolnshire.gov.uk)>

**Subject:** 4. Amendment Consultation

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## **PLANNING CONSULTATION: AMENDMENT RECEIVED**

**Reference Number: H09-0699-23**

**Type FULL**

Proposal: Erection of a 49.9MW Ground Mounted Solar Array with Associated Underground Cable Route, Substation with POC Mast, Battery Storage and Ancillary Equipment & Structures

Location: Caudwell Farm Holbeach St Matthews

Applicant: Green Energy International

**Amended Information:**

**Amendment 1**

**Covering Letter**

**Revised Statement of Community Involvement**

**Rebuttal and Addendum**

**Additional information via a presentation**

**Soil Resources & Management Plan**

**Additional information about Appeals and Amended Plans**

**Amended Flood Risk Assessment and Appendices**

**Agricultural Land Classification for Caudwell Solar Farm**

The Council have received an amendment to the above application and would be pleased to receive any further 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 **9th July 2024** 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 **Maxine Simmons** 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.

Consult\_Email\_Amend ODB95

05/07/2024

**Ref: Caudwell Farm Holbeach St Matthews**

**Re: Planning Consultation: Amendment**

### **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.

[Grid Scale Battery Energy Storage System planning – Guidance for FRS \(\[nfcc.org.uk\]\(https://www.nfcc.org.uk\)\)](https://www.nfcc.org.uk/grid-scale-battery-energy-storage-system-planning-guidance-for-frs)

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 \(\[www.gov.uk\]\(https://www.gov.uk\)\)](https://www.gov.uk/government/publications/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.

Should you wish to discuss 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