The countryside charity
Northamptonshire

The Wheatsheaf
Spring Hill Farm
Harborough Road
Pitsford
Northampton NN6 9AA

Telephone 01604 780000
info@CPRENorthants.org.uk
www.CPRENorthants.org.uk

Working locally and nationally for
a beautiful and living countryside

NW/23/00360: battery energy storage system (BESS) with associated infrastructure, Grendon Lakes, Main Road Grendon

Introduction

Very often the most significant concerns with a proposal are those not included in the application. This is certainly the case with this application which CPRE considers that there are three significant omissions that, in our view, make it unsafe to grant permission until they are addressed. The omissions are:

1. a detailed plan to handle a thermal runaway battery fire
2. the omission of the Green Hill Solar scheme and BESS from the cumulative impact assessment
3. The lack of a decommissioning plan

Battery Fire

The application merely asserts that the safety systems should prevent a thermal runaway fire. Unfortunately no systems are 100% reliable especially after an extended period in the field and as a result BESS fires do occur. As the number of battery units surrounding the Grendon substation increase the odds of a fire also increase. It should be noted that the Green Hill PEIR considers this possibility and this scheme should do the same.

The application should specify and evidence the necessary separation distances between battery units to prevent contagion and if the scheme is granted permission this should be required by condition. Regardless, even a single unit can burn for days (59 hours in the case of the Liverpool fire) and produce toxic fumes which could create an unacceptable hazard for nearby residents and require an evacuation. The other concern is that if water is used to extinguish or cool the fire, the water will become contaminated and it must be possible to prevent it running off into not only the nearby RAMSAR site, but also into the Nene and the downstream RAMSAR sites.

It is our view that a detailed plan should be required from the applicant that specifies how a fire would be managed and the features that would be incorporated into the scheme to support the fire fighting activity and clean up.

Green Hill Solar Farm

The cumulative impact section of the application needs to be updated to consider the Green Hill Solar Farm NSIP proposal for a 500MW solar scheme and a 500MW BESS which is also centred on the Grendon substation. In practice, should both schemes be permitted it is likely that as an NSIP scheme that can be connected at grid level, the Green Hill scheme would leapfrog the proposed scheme in gaining access to the grid.

The size and scale of the Green Hill scheme has the potential to cause cumulative impacts in all aspects of the development from changing the landscape character to construction traffic overloading the local road network.

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Decommissioning

It is concerning that no decommissioning plan is included given that the anticipated life of the scheme is around 30 years. As it stands the site could be abandoned at the end of the scheme's life without remediation. If the scheme is repowered then it would be necessary to dispose of the obsolete units and if it is not to be repowered then it should be a condition that the site is cleared which would be an expensive operation. If the site is decommissioned then it will be necessary to ensure that there are means to fund the decommissioning process such as a bond.

Other issues

The LVIA information contained in the application is cursory and contains nothing that illustrates the likely impact of the scheme, only the extent of the scheme within the views. We consider this inadequate for even professionals to draw safe conclusions about the impact of the scheme. There is potential for the scheme to impact on views on the PRoWs TF3, TF17 and TC11.

Conclusion

It is our view that the application as it stands is inadequate and that supplementary information should be required. In the absence of the missing information we object to the scheme.