LINCOLNSHIRE COUNTY COUNCIL'S RESPONSE TO CONSULTATION
ON THE FOLLOWING DEVELOPMENT PROPOSAL

District: South Holland District Council
Application number: H18-1077-24
Application Type: Full-Major
Proposal: Construction of a Battery Energy Storage System (BESS) and associated infrastructure
Location: Sutton Bridge Solar Farm, land to the south of Centenary Way, Sutton Bridge, PE12 9TF

Response Date: 4 February 2025

This report includes the Substantive response of the Local Highway and Lead Local Flood Authority to a planning consultation received under the Development Management Order and includes details of any planning conditions or informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement.

General Information and Advice

Please note that although the Definitive Map and Statement proves the existence of any recorded rights of way, there may be further or higher rights that are not shown on this document that the County Council is not currently aware of. This would be especially relevant where the public has had informal access to the site or where there are references to routes across this in maps or other historic documents. As the County Council has received no application to recognise further rights of way affecting the site, no more informed guidance can be offered at this stage.

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Highway and Lead Local Flood Authority Report

Substantive Response provided in accordance with article 22(5) of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

Recommendation: Approve with conditions

The Site is located within the previously approved Sutton Bridge Solar Farm. The Site lies to the east of the River Nene and 500m south-east of Sutton Bridge Power Station, approximately 1.25km south and east of the village of Sutton Bridge. The Site measures approximately 3.77ha. The Site will be accessed via the same point used for the solar farm, i.e. from Centenary Way, which connects to the A17 approximately 1.5km to the east. This is also the primary site access for Sutton Bridge Solar Farm, which is now operational.

Construction of the Proposed Development is expected to be completed within approximately 9-12 months, any effects arising from this would be short term and temporary. The Development has an operational lifespan of 40 years. The Proposed Development is temporary and reversible, at the end of the operational period, the Proposed Development would be decommissioned in accordance with best practice at that time. There are expected to be a total of 329 HGV deliveries over the course of the 9–12-month construction period. No abnormal loads will be required. This equates to an average of 8.4 inbound and 8.4 outbound HGV trips per week over a 9-month period (approx. 17 two-way), or 1.4 inbound and 1.4 outbound trips per day over a six-day week (approx. 3 two-way). This has been calculated over the most concentrated period of 9 months. If construction takes the maximum estimated time of 12 months, then the number of trips per week and day would be less. Other vehicles will also be delivered to Site early in the construction period. There are anticipated to be 70 two-way vehicle movements. These will include excavators, tractors and trailers, telehandlers, and Mobile Elevating Work Platforms (MEWP). Once delivered, most of the on-site vehicles are expected to remain in place until each construction stage is complete. Assuming a worst case that these trips all occur in the first month, this would equate to 9 inbound and 9 outbound trips per week (approx. 18 two-way) or 1.5 inbound and 1.5 outbound trips per day over a six-day week (approx. 3 two-way). Given the expected level of traffic generation, it is not anticipated that the development will create additional congestion or delay on the strategic or local road network.

An updated assessment of road traffic collision data has been undertaken using publicly available information from the Crashmap website (www.crashmap.co.uk). The most recent five-year data set (2018-2022) was interrogated along the access route from the Site entrance to the A17. One fatal accident was recorded on Centenary Way in 2022 involving two vehicles and one casualty, approximately 500m northwest of the junction with King John Bank. One slight accident was recorded approximately 300m east of the junction of the A17 and King John Bank in 2021 involving two vehicles and one casualty. Two further slight accidents were recorded on Sutton Road, opposite the A17/ King John Bank junction. The accident data has presented no ‘hotspots or issues that would require special consideration as part of the

application. The framework CTMP produced demonstrates that adequate arrangements can be put in place to minimise and manage the environmental / traffic impacts from the construction phase of the development. The proposal will not have a detrimental impact upon highway safety or capacity issues.

The EA Flood Map for Planning5 shows that the Site is in Flood Zone 3a and Flood Zone 2 and is not at risk of Surface Water Flooding. The Proposed Development will drain surface water to an attenuation structure via a piped network and release to the hydrological environment at greenfield rates and discharge to the open IDB watercourse land drain of the River Nene, approximately 40 m north of the BESS Compound area via a detention basin.

Therefore, the proposal will not increase surface water flood risk to the development site, surrounding properties or land.

There is no precise definition of "severe" with regards to NPPF Paragraph 109, which advises that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Planning Inspector's decisions regarding severity is specific to the locations of each proposal, but have common considerations:
• The highway network is over-capacity, usually for period extending beyond the peak hours
• The level of provision of alternative transport modes
• Whether the level of queuing on the network causes safety issues.

In view of these criteria, the Highways and Lead Local Flood Authority does not consider that this proposal would result in a severe impact with regard to NPPF.

Highway Informative 02

In accordance with Section 59 of the Highways Act 1980, please be considerate of causing damage to the existing highway during construction and implement mitigation measures as necessary. Should extraordinary expenses be incurred by the Highway Authority in maintaining the highway by reason of damage caused by construction traffic, the Highway Authority may seek to recover these expenses from the developer.

Highway Condition 00

The development hereby permitted shall be undertaken in accordance with a Construction Management Plan and Method Statement that shall first be approved in writing by the Local Planning Authority. The Plan and Statement shall indicate measures to mitigate the adverse impacts of vehicle activity and the means to manage the drainage of the site during the construction stage of the permitted development. It shall include;

- the phasing of the development to include access construction;
- the on-site parking of all vehicles of site operatives and visitors;
- the on-site loading and unloading of all plant and materials;
- the on-site storage of all plant and materials used in constructing the development;
- wheel washing facilities;
- the routes of construction traffic to and from the site including any off-site routes for the disposal of excavated material and;

• strategy stating how surface water run off on and from the development will be managed during construction and protection measures for any sustainable drainage features. This should include drawing(s) showing how the drainage systems (temporary or permanent) connect to an outfall (temporary or permanent) during construction.

Reason: In the interests of the safety and free passage of those using the adjacent public highway and to ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, the permitted development during construction.

Highway Condition 35

Prior to the commencement of any part of the development hereby permitted, the condition of the parts of the carriageways along the proposed route that will be used by vehicles making deliveries of materials and components to the permitted development shall be recorded by written notes, still and moving photographic images during an inspection that shall be undertaken by the Applicants' representatives in the company of an officer of the Local Highway Authority. Those public roads shall be maintained, at the cost of the Applicants, in a safe and suitable condition throughout the construction phase of the permitted development and shall be reinstated to no less than the standard of their pre-commencement condition following completion of the construction phase. The Applicants shall also follow a reciprocal process during the decommissioning of the permitted development.
Reason;
To ensure the safety and free-passage of the public using the carriageway along the proposed route during the construction and decommissioning of the permitted development.
Officer's Name:

Officer's Name: Dean Whitehead
Officer's Title: Senior Development Management Officer
Date: 4 February 2025

Lincolnshire
FIRE & RESCUE

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08/01/2025

Ref: H10-1077-24

Sutton Bridge Solar Farm,
Land to the South of Centenary Way,
Sutton Bridge
PE12 9TF

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/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.

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)

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)

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