

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : SMD/2024/0423

Site Address: Greenfields Thorney Edge Road Bagnall Staffordshire ST9 9LA Stoke On Trent

Comments by: Carl Baker

From:

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Submission: Objection

Comments: I read the battery management plan. Risks of fire and mitigation are mentioned but appear inadequate in describing the risks, the effectiveness and control of the mitigation and the consequence and reliability of the suppression system, for example:

Risks

What are the risks associated with a battery fire? Has an assessment been performed of the potential hazards and severity in accordance with IEC 61508/11?

How do you ensure there is no domino effect where one battery ignites and results in the next battery doing likewise from the exterior heat transfer?

Prevention

What SIL rating of equipment will be incorporated into the design of the battery to prevent the thermal runaway scenario?

Mitigation

How much FM200 gas will be required to put out the battery fire? Where will this be stored? What if the weather is windy and raining - how effective with the FM200 system be and will how will rain be prevented from contacting the lithium to prevent explosion? What are the environmental and health and safety consequences of its deployment into the atmosphere? What is the dispersion model for the molecules distributed into the air from the fire? What communications will be made to the community for this scenario to ensure their safety and protection? There appears to be no emergency response plan present in the planning file - when will this be produced, discussed with the local emergency services and shared with the community?

If it is raining and the mixture of battery materials, FM200 gas and combustion products are washed into the land what will the consequences be and how will this be contained or cleaned up after the event?

Controls & testing

How will the equipment be tested to ensure that if and when it is required it will be guaranteed to perform? This would include the internal controls of the battery to prevent an over heating/thermal runaway and the suppression equipment.

What will be the training and competence level of the staff used for the testing - what specific qualifications will they be required to possess to ensure that they able to properly perform the testing?

There appears to be significant gaps in the above - which is the most important topic of all in the application - the safety controls of the asset and the protection of the health and safety of the community and the local environment.,

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