
From:
Sent: 16 September 2025 13:56
To: Planning (SMDC)
Cc: Dan Keeling
Subject: Fw: FRS Consultation, New House Farm BESS - Staffs Moorlands planning application SMD/2024/0568

Categories:

FAO: Declan Cleary, Case Officer

Hello Declan,

I have reviewed the revised documents submitted for consultation as detailed in 'PWA Energy Planning Luzlow Amends July 25' uploaded to Staffordshire Moorlands Planning on 2/9/2025.

Much of our previous consultation response is still applicable.

I refer to the following documents;

- ARC-1223-003-R4_YLEM_Luzlow_OBSMP_Issue_2 uploaded to Staffordshire Moorlands Planning on 3/3/2025
- ES Figure 1.1 - Site Location Plan (ref. LZL-BESS-001.4 Rev 2) uploaded to Staffordshire Moorlands Planning on 2/9/2025
- ES Figure 1.2 - Proposed Site Plan (ref. LZL-BESS-001.5 Rev 5) uploaded to Staffordshire Moorlands Planning on 2/9/2025

We recommend particular attention should be drawn to the following:-

- The application proposes reduced spacing between the containers. Current NFCC guidance recommends 6m spacing. Recommend subject to planning condition.
- Site plan LZL-BESS-001.5 Rev 5 shows a single access track that diverges at 24m from the nearest BESS container. NFCC guidance requires two separate access points to the site to account for opposite wind conditions/likelihood.

The application seeks to justify the single access track by predicting likely wind direction. This is not considered compliant. NFCC guidance requires a second access point from the road be provided, ideally at 180 degrees from the other. Recommend subject to planning condition.

- Access track dimensions and construction should be compliant with Approved Document B Table 15.2. Recommend subject to planning condition.

- OBSMP ARC-1223-003-R4_YLEM_Luzlow_OBSMP_Issue_2 proposes five options for firefighting water supply. The recommendation in NFCC guidance is for a fire hydrant to be provided that is capable of supplying at least 1900 litres per minute for 2 hours, and sited so that it can be accessed safely during a fire. Other water sources, including static water tanks, are not considered to meet this requirement. Any water tanks that are provided should be sited so as to guarantee accessibility during a fire. Recommend subject to planning condition.
- OBSMP ARC-1223-003-R4_YLEM_Luzlow_OBSMP_Issue_2 specifies compliance with a range of standards, in particular UL9540A. Recommend subject to planning condition.
- The application makes no reference to explosion protection through compliance with NFPA 68, NFPA 69 or equivalent. Recommend subject to planning condition.
- BESS containers are within approximately 3.5m of 33kV switchrooms. Consideration should be given to reducing the potential for fire spread from BESS to switchroom.

Regards,

Watch Manager / Fire Safety Advisor

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