

[REDACTED]

From: NSDG - Protect <[REDACTED]>
Sent: 27 July 2026 12:16
To: Planning (SMDC)
Subject: Re: Rev Plans Gen External Consultation - App ref SMD/2024/0423

[REDACTED]

Good morning,

Thank you for the opportunity to comment on this application.

I have reviewed the application with consideration of the following documents;
Site Location Plan CD-01-P01 Rev. 02 14/3/24
Proposed Site Plan CD-01-P02 Rev. 04 29/5/25
Greenfire Solutions Outline Battery Safety Management Plan Issue 01 July 2026
Greenfire Solutions Verification and Compliance Report Issue 01 July 2026

I note that Greenfire Solutions Verification and Compliance Report Issue 01 July 2026 Appendix 4 suggests eight planning conditions.
I recommend that these conditions are adopted, with minor changes to conditions one and three (**in bold**), plus one ~~striketrough~~ in condition 3.

DRAFT CONDITION 1—DETAILED BATTERY SAFETY MANAGEMENT PLAN

Prior to commencement of development, a Detailed Battery Safety Management Plan (DBSMP), to include a Hazard Mitigation Analysis prepared in accordance with NFPA 855:2026 §4.2, will be submitted to and approved in writing by the Local Planning Authority in consultation with Staffordshire Fire and Rescue Service. The DBSMP will address each of the matters identified in §07 of the Verification and Compliance Report (Greenfire Solutions, July 2026) **and will have regard for the content of the Outline Battery Safety Management Plan (Greenfire Solutions, July 2026)**. The development will be carried out in accordance with the approved DBSMP.

Reason: To ensure that the development incorporates appropriate fire safety provisions and emergency response arrangements consistent with the NFCC V2 Guidance and the Health and Safety at Work etc. Act 1974, in the interests of public safety and the protection of nearby sensitive receptors.

DRAFT CONDITION 2 — UL9540A AND TRPT EVIDENCE AT PROCUREMENT

Prior to procurement of the BESS enclosures, the Applicant will submit to the Local Planning Authority, for approval in consultation with Staffordshire Fire and Rescue Service, evidence that the selected BESS enclosure has been the subject of UL 9540A:2025 cell-, module-, unit- and installation-level testing, together with independent Large Scale Fire Testing (LSFT) demonstrating no propagation between adjacent enclosures at the proposed inter-enclosure spacing. The evidence will confirm that the Thermal Runaway Propagation Time (TRPT) achieved by the selected enclosure is not less than 30 minutes.

Reason: To verify that the inter-enclosure spacing departs from the NFPA 855:2026 default of 0.914 m / 3 ft only where supported by appropriate manufacturer testing, and that sufficient time is available for detection, SFRS notification and the adoption of a defensive firefighting strategy.

DRAFT CONDITION 3 — 1 KM SENSITIVE RECEPTOR PLAN AND SMOKE PLUME ANALYSIS

Prior to commencement of development, the Applicant will submit a 1 km sensitive receptor plan in accordance with NFCC V2 Guidance §§17–18, including a compass rose of prevailing wind directions and identifying all residential, commercial, heritage, ecological and amenity receptors. Where the receptor plan identifies any sensitive receptor within a credible fire-gas plume zone, a site-specific Smoke Plume Analysis Report (SPAR) confirming **AEGL-1, AEGL-2 and AEGL-3 zones for CO, HF and HCl that IDLH thresholds for CO and HF are not exceeded at any identified receptor** will be submitted and approved by the Local Planning Authority in consultation with Staffordshire Fire and Rescue Service **and the information incorporated into the Emergency Response Plan.**

Reason: To ensure that the directional risk from fire-generated gas plumes is understood and managed, in the interests of public safety and the protection of nearby heritage and amenity receptors.

DRAFT CONDITION 4 — EMERGENCY RESPONSE PLAN AND TACTICAL FIRE RESPONSE PLAN

Prior to energisation of any part of the development, an Emergency Response Plan (ERP), supported by a site-specific Tactical Fire Response Plan (TFRP), will be submitted to and approved in writing by the Local Planning Authority in consultation with Staffordshire Fire and Rescue Service. The ERP and TFRP will address site access, raw and used water provision, defensive firewater containment, post-incident reignition watch and the contained-disposal of firewater. The development will not be energised until the ERP and TFRP have been approved and the arrangements they identify are in place.

Reason: To give effect to the NFCC Planning Policy Position Statement of 27 March 2026 (firefighting water supplies in place and confirmed prior to energisation) and to ensure that emergency response arrangements are agreed before the site becomes operational.

DRAFT CONDITION 5 — FIREFIGHTING WATER PROVISION

Prior to energisation of any part of the development, the above-ground static firefighting water tanks shown on the approved Overall Site Layout Plan will be installed, set back at least 10 m from the nearest BESS enclosure, and provided with refill arrangements agreed with Staffordshire Fire and Rescue Service. The Local Planning Authority will be notified in writing, prior to energisation, that the tank is in place and operational.

Reason: To confirm, prior to energisation, that the firefighting water supply equivalent to 25 L/s for 120 minutes (NFCC V2 Guidance) is in place and funded by the developer, consistent with the NFCC Planning Policy Position Statement of 27 March 2026.

DRAFT CONDITION 6 — FIREWATER CONTAINMENT

Prior to energisation, the firewater containment arrangements will be installed and commissioned. A contained-disposal protocol consistent with the Environment Agency /NIEA / Water UK / CFOA joint guidance of 2018 will be agreed in writing with the Local Planning Authority and Staffordshire Fire and Rescue Service.

Reason: To prevent post-incident contamination of the unnamed land drain, the Trent & Mersey Canal Conservation Area and surrounding receptors, in the interests of environmental protection.

DRAFT CONDITION 7 — FIRE COMMUNICATION FRAMEWORK AND ANNUAL EXERCISE

Within six months of energisation, a Fire Communication Framework (FCF) will be established between the operator and Staffordshire Fire and Rescue Service, with a written record of the agreed governance, information flows, review cadence, familiarisation visits and an annual joint exercise programme. The FCF and an annual exercise record will be maintained throughout the operational life of the development and made available to the Local Planning Authority upon request.

Reason: To ensure that ongoing liaison with the local Fire and Rescue Service is established and demonstrably effective, consistent with NFCC V2 Guidance and current Fire Service expectations.

DRAFT CONDITION 8 — DECOMMISSIONING AND HEALTH AND SAFETY FILE

No later than twelve months prior to the end of the operational life of the development, a Decommissioning Plan and updated Health and Safety File (CDM 2015) will be submitted to and approved in writing by the Local Planning Authority in consultation with Staffordshire Fire and Rescue Service. Decommissioning will be carried out in accordance with the approved plan, and the site restored to a condition that supports its lawful subsequent use.

Reason: To secure the safe and orderly decommissioning of the development at the end of its operational life, consistent with the Construction (Design and Management) Regulations 2015 and current Environment Agency expectations on stranded-energy and damaged cell management.

Regards,

Matt

Matt Jones

Watch Manager / Fire Safety Advisor

NSDG Protect, Newcastle Fire Station



Staffordshire Fire and Rescue Service



From: Planning (SMDC)

Sent: 07 July 2026 08:30

To: NSDG - Protect

Subject: Rev Plans Gen External Consultation - App ref SMD/2024/0423

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