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Date: 13th May 2024

Dear Gwyn,

Legacy Energy Storage System - Safety Summary Note

Thank you for providing a summary of the public representations received on the application. We are conscious that safety has been raised in the public representations, in PAC feedback and at community consultation. We're also aware that the Outline Battery Safety Management Plan included in the application is a technical document and some of those commenting may not have had an opportunity review or consider this. We'd therefore like to take this opportunity to clearly set out our approach to safety in this summary note.

Safety is the number one priority on all our projects and influences site selection, design and the equipment procured. The most recent guidance from the National Fire Chiefs Council provides a minimum separation distance of 25m to occupied buildings. Through our site selection process we have ensured that the site is over 250m from the closest residential buildings.

The site layout has also been shaped by the National Fire Chiefs Council's guidance document on Grid Scale Battery Energy Storage. Table 5.1 of the OBSMP summarises the requirements set out in this guidance and confirms that the proposed site layout is compliant with each requirement. For example, two points of access, suitable spacing and water storage are all included within the design.

Furthermore, the Energy Storage System will be remotely monitored 24 hours a day and any abnormalities will be reported in real time with automatic shut off and suppression systems in place to trigger a rapid and appropriate response.

The project is looking to utilise Lithium Iron Phosphate (LFP) batteries, which are much more stable than traditional Lithium batteries. LFP batteries are also safer because thermal runaways are less likely, and they have a higher number of cycles during their operational lifespan (between 2,000 and 5,000 cycles) than most other Lithium battery technologies.

An Outline Battery Safety Management Plan (OBSMP) has been included in the application which sets out the overarching processes, procedures and means by which the Energy Storage System safety management is to be implemented and assessed.

A Detailed Battery Safety Management Plan (DBSMP) will then be prepared ahead of implementation once further site-specific details are available, for example, the exact battery technology to be procured. Crucially, the DBSMP will contain an Emergency Response and Contingency Plan prepared in liaison with the local Fire and Rescue Service. This was a key failing of



the Carnegie Road (Liverpool) Energy Storage System fire; the Fire and Rescue Service were not aware of the Energy Storage Systems location, nor how to respond if an incident occurred.

A Site Safety Audit will be prepared once the development is operational and will ultimately validate the Energy Storage System installation against the safety requirements and identified control measures in the DBSMP.

We have discussed the proposals with the Regional Emergency Planning Service early in the development process and offered to meet directly with the local Fire and Rescue Service during Pre-Application Consultation.

Grid-scale Energy Storage Systems are considered an inherently safe technology. Since 2006, they have operated for approximately 4.8 million hours in the UK, with only one reported incident that required fire service attendance (Carnegie Road, Liverpool).

We trust this summary note clarifies our position with regards to the safe implementation and operation of the proposed Energy Storage System, however if you have any further queries please do not hesitate to contact us.

Kind regards,

William Griffiths

Project Manager

[Redacted signature]
[Redacted contact information]

