



**PARISH COUNCIL**

29 Great Lane  
Reach  
Cambridgeshire  
CB25 0JF  
6 August 2025

Dear Toni Hylton,

**25/00639/FUM**

**ERECTION OF A BATTERY STORAGE FACILITY**

**LAND SOUTH WEST OF HIGHTOWN DROVE, BURWELL**

Reach Parish Council (PC) wishes to comment on this application given its proximity to the village of Reach and in light of widespread and serious concerns it has generated within our community.

The PC considers this proposed facility to be in the wrong location and strongly objects to this application. We judge that the application meets the criteria for refusing such an application set out in ENV9 of the District's Local Plan.

The specific grounds for our objection are:

**1. Public health in the event of thermal runaway**

Thermal runaways at Lithium based battery storage schemes are rare but increasing as more such schemes are constructed. There have now been over one hundred across the world.

A thermal runaway at this site would have a profound impact on households in Reach. Almost all homes of the village lie within a kilometre of the proposed site, some are much closer.

The assumptions about the area impacted by highly toxic fumes released during a thermal runaway, on which current UK guidance is based, do not reflect the damage assessments of recent thermal runaways. Accordingly those assumptions are overly optimistic. Similarly, the Battery Fire and Plume Analysis produced by DNV and submitted in support of this application is not up to date and, in its conclusion that impact would be 'localised', is also over-optimistic.

Support for our assertions can be found in examination of the thermal runaway at a battery storage facility at Moss Landing in California on 16 January 2025. This generated highly toxic plumes that extended well over a kilometre. The emergency services there created an evacuation zone that extended to 6km around the facility. Glenn Church, a senior official involved in responding to the incident stated "It is obvious that this technology (i.e. lithium based battery storage) is ahead of both government's ability to regulate it and private industry's ability to control it". In response to the Moss Landing runaway, the California Assembly is currently considering draft legislation that will require a minimum 3200ft (ca. 1Km) standoff between lithium based battery storage schemes and homes.

Reach PC acknowledges that that the technology in this application is more modern than that at Moss Landing and that the likelihood of a thermal runaway event occurring is probably lower. However the application is still based on lithium batteries and, as the developer accepts in its application, a risk of thermal runaway remains and there is no way of stopping the runaway once it has commenced or of controlling airborne pollution.

There are no UK regulations governing how far battery storage schemes of this kind should be sited from homes to mitigate the dangers to public health of a runaway. Instead decisions are made on guidance, principally that of the National Fire Chief Council (NFCC). As mentioned above, Reach PC believes that this guidance is based on outdated information and understands that a revised version is expected shortly. The current NFCC guidance does not prescribe distances from homes for battery storage schemes but it does emphasise the importance of a comprehensive risk management process undertaken by operators to identify hazards and risks specific to the facility. It is reasonable to assume that that this would involve a detailed examination of public health risks arising from a thermal runaway. However whilst the developer claims to be compliant with NFCC guidance, Reach PC can see no evidence that the developer has undertaken a sufficiently comprehensive, detailed and up to date analysis of the risks to the residents of Reach. Accordingly the PC believes that the assurances offered in the application are insufficient.

On an associated issue, Reach PC questions whether the local fire service is equipped to maintain business as usual provision to the local community whilst committed to managing a thermal runaway incident at this site.

Reach PC is not alone in being concerned about the absence of appropriate guidance and regulation on battery storage schemes. The House of Commons debate on this issue of 5 June 2025 demonstrated cross-party concern about the lack of regulation and the reliance on self regulation. Some MPs called for a pause on such schemes until their safety could be assured.

## **2. Threat to nature in the event of a thermal runaway**

The proposed development lies within the National Trust's Wider Wicken Vision (WWV) area. In furtherance of the WWV, the National Trust has acquired land adjacent to the proposed development, much of it being the 24 Acres in the parish of Reach. A thermal runaway incident at the proposed site would likely have a profound impact on this area and potentially on the National Nature Reserve at the core of the WWV.

Reach PC notes that a 4050 cubic metre, lined attenuation basin would be constructed to both supply and collect water used to manage a thermal runaway. The developer asserts that this would be sufficient for 35 hours of firewater runoff but we can see nothing to demonstrate that this would be sufficient for a worse case runaway at this site. The PC notes that most thermal runaway events require cooling water to be applied for longer than 35 hours. As things stand, we are not assured that a thermal runaway at this site could be managed without highly toxic firewater entering the local hydrological system.

Furthermore the Devil's Dyke SSSI and Wicken Fen NNR, internationally significant sites for nature lie within 800 metres and 2.5km respectively of the proposed site. As such both are vulnerable to airborne pollution from a plume from a thermal runaway. As stated above, we believe that the plume analysis deployed in support of this application is out of date and overly optimistic.

## **3. Adverse Impact on the landscape of Burwell Fen**

Nine other energy developments have been built or approved within 1.5 kilometres of the site. We understand that National Grid intends to build a new substation within a few hundred metres of the site. The developer uses one of these developments to argue that the damage of its own scheme won't make an appreciable difference. We consider this argument sets a dangerous precedent that will lead to situation where every successful energy development application will make it easier for subsequent applications to dismiss adverse impact on the visual landscape. This heightens our concern previously raised with David Morren about the cumulative impact of energy developments on Burwell Fen (Correspondence which rests with Councillor Acklam's email to Mr Morren of 24 March 2025).

We disagree with the developer's landscape assessment, believing that the heavily industrialised footprint of this scheme, involving fencing, lighting, cameras, switchgear and transformers, including electrical units, some of which are over 12 metres long and others nearly 3 metres tall, will have a profoundly detrimental affect on views from surrounding land, notwithstanding the presence of other energy schemes nearby. The surrounding area contains a network of public paths and bridleways which

we as a Parish and the National Trust are successfully encouraging people to use. The vegetative screening proposed by the developer will take years to take effect and screening will itself alter the open character of this area.

We also disagree with the developer's assertion that noise from the cooling fans at the site can be dismissed. The surrounding countryside is open and flat. Artificial noise is minimal. The noise from the cooling will be intrusive over a wide area, degrading the value for quiet recreation of adjacent land at the 24 Acres which we as a Parish in conjunction with the National Trust have successfully and significantly raised in recent years.

#### **4. Insufficient uplift for nature**

Finally we note the developer's claim that the proposal would lead to a BNG in excess of 20 percent. Whilst this exceeds the statutory requirement, we feel that such an uplift on what is currently intensive arable land is disappointing. If the scheme is to be approved we would request that a significantly higher requirement is set.

Copies of this letter go to District Councillors Charlotte Cane MP and John Trapp.

Susan Bailey

Clerk to Reach Parish Council