

Denise Dickson

From: Denise Dickson
Sent: 08 December 2020 09:41
To: Denise Dickson
Subject: FW: AN ISSUE OF SERIOUS PUBLIC SAFETY IN NORTHERN IRELAND

Importance: High

From: Oakleaf Solutions <[REDACTED]>
Sent: 07 December 2020 12:19
To: Oakleaf Solutions
Subject: AN ISSUE OF SERIOUS PUBLIC SAFETY IN NORTHERN IRELAND

To Whom it May Concern

Planning permissions for five battery energy storage systems (BESS) have been granted by the respective local authorities as set out below:

- Gort BESS - 20MW - Fermanagh and Omagh District Council
- Kells BESS - 50MW - Antrim and Newtownabbey Borough Council
- Tamnamore (Drumkee) BESS - 50MW - Mid Ulster District Council
- Tandragee (Mullavilly) BESS - 50MW - Armagh City Banbridge and Craigavon Borough Council
- Castlereagh BESS - 50MW - Lisburn and Castlereagh City Council

These BESS's were granted permission on the basis that they are NON GENERATING facilities and 2 of them have proceeded to construction/operation from those planning permissions.

To our knowledge no Hazardous Substances Consent (HSC) has been granted for these facilities.

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Extracts from the draft minutes of the Strategic Planning Group (DfI) meeting dated 7<sup>th</sup> July 2020:

"An issue has arisen about how these (BESSs) are dealt with in the planning system ..."

"The UK Govt position is that electrical storage facilities are a form of GENERATING STATION and has committed to amending legislation to define energy storage as a subset of electricity generation."

"Dept of the Economy (consents electricity generating facilities)....confirmed that the position is the same in NI."

"...the Utility Regulator (who licence the generation of electricity) ...we understand also view BESSs as electricity generating for their purposes."

".....the likely implications of this are that BESSs need to be assessed under the Development Management Regulations as 'electricity generating stations', and subject to the thresholds (5MW and 30MW), may be 'major' or 'regionally significant'. There may also be implications for screening these proposed developments under EIA."

In light of the above, please note that major applications require pre-application community consultation, regionally significant applications require a ministerial decision and if the site area is over 0.5H they will require an environmental impact assessment (EIA).

Additionally, all BESSs are required to submit chemical data in a threshold assessment can be carried out, together with Control assessment in relation to dangerous substances. Further, application consent.

Further extracts from the draft minutes of the Strategic Planning

“.....BESS batteries can consist of several types and some contain flammable and, additionally, if exposed to air through a loss of cover spoken with the HSENI and will shortly be issuing letters to a number of applications, advising them to contact the applicants before the hazardous substance consent may be necessary. It is a direct offence without the requisite consent.”

To finish, there were 2 action plans:

AP9

The Department (DfI) will shortly be issuing letters to a number of before the development commences that hazardous substance consent battery storage.

AP10

Once DfE and Utility Regulator have confirmed their position in view Department (DfI) will clarify its position on the matter publicly.

We understand that to date, there is a continuing failure to follow

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Due to the total inaction of DFI and the local Councils the following

- 50MW Tamnamore (Drumkee) BESS has recently completed <http://www.soni.ltd.uk/newsroom/press-releases/drumkee> planning permission for this BESS has not been revoked a hazardous substance consent.
- 50MW Tandragee (Mullavilly) BESS is currently under construction planning permission granted in 2018 for this BESS was de which has been submitted for a larger site and different e Council. Furthermore, this fresh application continues to and as a local development. To our knowledge, it does not

Both of these BESSs are constructed with NEC battery plant - the caught fire in September 2020 in Liverpool with a large explosion toxic gases. NEC state that they are 'winding down' their battery commitment to future safety for management and maintenance

- 50MW Kells (Co Antrim) BESS for which permission has been group) state that on the 14 October 2020, 5 senior political Infrastructure to revoke this planning permission. There that the minister states the advice of senior counsel is being asked to revoke this planning permission and they say the

DFI have been aware of the dangers of BESSs since August 2019 when “Kells VOCAL” asked DFI to determine that BESSs were generators, so that they could be properly processed and the fire safety issues scrutinised by DFI as regionally significant applications. No action has been taken.

DFI and Councils are fully aware that HSC threshold assessment and Consent is required for these facilities. These bodies have failed to stop the construction of these facilities and their operation without this Consent.

When a fire and explosion happens at one of these battery generating stations in Northern Ireland, the Department of Infrastructure, together with the Councils and/or PACNI who approved them, will be responsible for any loss of life and damage to property. Each of those bodies have had the opportunity to take the necessary action and halt construction/operation before it even started. To date, they have failed to act. These facilities are being built close to people's houses and public roads, with total disregard to public health & safety and without environmental checks for e.g., fire water runoff into Lough Neagh (in the Drumkee BESS case).

Meanwhile, we believe the lives of innocent and unsuspecting citizens of NI are under day and daily threat from these highly dangerous and volatile facilities.

NOW, WE ASK YOU TO:

- **REVOKE ALL EXTANT PERMISSIONS FOR BESSs IN NI, FORTHWITH**
- **INSTRUCT THE CESSATION OF CONSTRUCTION/OPERATION BY WAY OF INJUNCTION, IF NECESSARY, AND/OR THE ISSUE OF AN ENFORCEMENT NOTICE ON, THE TAMNAMORE (DRUMKEE) BESS, IMMEDIATELY.**
- **INSTRUCT THE CESSATION OF CONSTRUCTION/OPERATION BY WAY OF INJUNCTION, IF NECESSARY, AND/OR THE ISSUE OF AN ENFORCEMENT NOTICE ON THE TANDRAGEE (MULLAVILLY) BESS, IMMEDIATELY.**

THESE BESS GENERATING STATIONS ARE SUBJECT TO UNCONTROLLABLE FIRES, EXPLOSION, AND THE RELEASE OF TOXIC GASES. A 50MW BESS HAS THE EXPLOSIVE POWER OF 50 TONNES OF TNT.

BY NOW, YOU WILL APPRECIATE THE URGENCY TO SAVE THE LIVES OF THOSE AT RISK AND THEREFORE WE CALL FOR YOUR IMMEDIATE ATTENTION AND ACTION. TODAY IT MAY BE YOUR COUNTRYMAN IN ANOTHER PART OF NORTHERN IRELAND, TOMORROW IT MAYBE YOU.

