



Statera Agreed Fire Liaison Framework with Buckinghamshire Fire and Rescue Service



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GRESTON ASSOCIATES COMPANY BACKGROUND

1. Greston is led by Dave Etheridge OBE, FIFireE, MIOSH – former Chief Fire Officer and President of the UK Chief Fire Officers Association. Dave was recognised by Her Majesty the Queen in the 2015 New Year’s Honours – being awarded an Officer of the Order of the British Empire (OBE) for Services to Fire and Rescue and the Community. He is also the first UK Fire Officer to receive the National German Fire Service Medal in 2017 from the German Federal Government for Supporting International Relations.
2. Greston currently works with government departments and local authorities as well as private sector clients, providing a wide range of high-quality, bespoke, and ethically sound advice and support including:
 - Operational Advice and Assurance
 - Fire Safety Strategies including Protection and Prevention
 - Legal Advice in Relation to UK Fire Legislation
 - Liaison with Local Authority Fire and Rescue Services on Behalf of Third Parties
 - Liaison with Parish, District and County Councils including Elected Members and Officers.
 - Political Fire Authority Support including Elected Member Training
 - Independent Audit and Review
 - Pre- and Post-Inspection Support
 - Technical Guidance and Advice
 - Strategy and Business Development
3. Since the launch of Greston Associates Ltd in March 2017, we have enjoyed considerable growth, built upon the foundations of a solid reputation for delivering high quality outcomes. We have been appointed by the Home Office as Subject Matter Experts in the field of Emergency Services.

4. Additionally, we work in the UK with the Local Government Association, London councils, local authorities, fire and rescue services and Police, Fire and Crime Commissioners, in addition to a range of private sector clients such as Fire Service College, PwC, Hart International, Fire Knowledge Ltd, Motorola and Occupational Research in Health Ltd.
5. We have also delivered assignments and consultancy services overseas particularly in the Middle East.
6. Our focus is to build trusting relationships with our clients to become their preferred partner of choice into the future.

REPORT EXECUTIVE SUMMARY

7. Statera Energy was founded in 2015 with the aim of delivering increased flexibility for the UK electricity system. With over 1GW of assets in operation or under construction in the UK, Statera has an unrivalled track record in developing, delivering, and operating flexible energy assets. Statera operates Battery Energy Storage System (BESS) sites in Hertfordshire, Essex, Yorkshire, and Wiltshire. All of Statera's operational BESS sites comply and operate in accordance with the requirements of all applicable UK Health Safety & Environmental legislation.
8. BESS facilities provide a means of allowing electricity from the grid to be imported and stored at times of low demand/high generation, which can then be exported back into the grid at times of higher demand / system stress. Battery storage is a key part of this energy strategy and provides National Grid with balancing services to help accommodate the increasing level of renewable energy generation. By importing excess renewable energy from the grid and storing it, batteries can capture energy that would otherwise be lost/unutilised. In respect of their storage ability, batteries offer opportunities to support the intermittent nature of renewables by storing the excess energy they produce and importing it back into the grid when demand requires.
9. Statera Energy Ltd appointed Greston Associates in February 2023 to complement and enhance their approach to working with all stakeholders concerning current and future sites. Whilst the Fire and Rescue Service is not a statutory consultee in relation to BESS projects at the planning stage, Statera recognised that early (preplanning) discussions with Fire and Rescue Services (FRS) will ensure the latest technology, information, operational and environmental excellence can be integrated into plans and deployed across all future sites.
10. Greston's end to end approach adds to the professionalism of Statera throughout the life cycle of the projects associated with the BESS build, and day to day operations. This will include rigorous and continuing support at preplanning, planning submission and multi-agency liaison, commissioning, and operational delivery (business as usual) of the BESS.
11. The outcome of Statera's comprehensive fire management approach is world leading through engagement with sector expertise. This includes organisations which have worked with battery storage solutions for many years and therefore bring experience and learning. Additionally, the early engagement with the local fire and rescue service at the

design stage ensures that any detection monitoring and fire suppression approach to the management of fire risk is 'best in class'. Site information and intelligence is openly shared by Statera with responding resources, and ongoing training and support is provided to local crews and the wider Buckinghamshire (BFRS). This will also include working with BFRS concerning the creation and regular testing of an agreed Operational Response Plan.

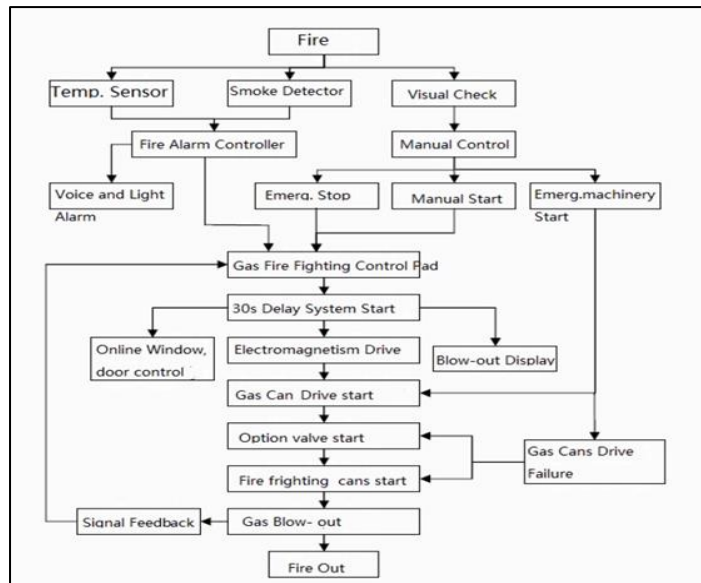
12. An online meeting took place with BFRS on the 14th of April 2023 where the Fire Liaison Framework and the 'Statera Underlying Principles' detailed below, were discussed. The email exchange detailing the positive outcomes of the meeting are found in Appendix A.

BACKGROUND INFORMATION

13. Since 2015 Statera has focused on high-quality development, delivery, and operation of flexible infrastructure. Their in-depth knowledge of the energy marketplace is backed-up by specialist skills and capability that is trusted by many stakeholders.
14. The amount of renewable energy generation forecast to be installed in the UK by 2030 means a transformational shift in how the national grid operates is now required. To address the renewable energy challenge, Statera build, own, and operate flexible energy infrastructure that solves the issues of balancing grid supply and demand. The projects Statera deliver are aiming to decarbonise the electricity system, while ensuring greater energy security.
15. Statera currently operates 600MW of Battery Storage and 150MW of flexible gas generation. It has an established Operation and Maintenance business-'Statera Energy Operations' which manage and maintain their existing plant to exceptionally high standards.
16. Statera wish to continue to enhance their approach to working with all stakeholders concerning current and future sites, including the Fire and Rescue Services. Whilst the Fire and Rescue Service is not a statutory consultee in relation to BESS projects at the planning stage, in England, the primary legislation for which Fire and Rescue Services (FRS) have direct statutory responsibilities are as follows:
 - The Fire and Rescue Services Act 2004 (sets out the responsibilities of Fire and Rescue Authorities (FRAs)).
 - The Building Safety Act 2022
 - Regulatory Reform (Fire Safety) Order 2005
 - Fire Safety Act 2021 and Fire Safety Regulations (England) 2022
 - Civil Contingencies Act 2004
 - Policing and Crime Act 2017
 - Crime and Disorder Act 1998
17. In England, the FRS is also a statutory consultee of the Local Authority Building Control and will generally consider the guidance contained within Approved Document Part B (Fire Safety) from The Building Regulations.

- 18.** The Fire and Rescue Services Act 2004 gives the Government responsibility for producing the Fire and Rescue National Framework which outlines the Government's high-level priorities and objectives for Fire and Rescue Authorities in England. The National Framework's priorities for Fire and Rescue Authorities are to:
- Identify and assess the full range of foreseeable fire and rescue related risks their areas face, make provision for prevention and protection activities and respond to incidents appropriately
 - Work in partnership with their communities and a wide range of partners locally and nationally to deliver their service
- 19.** Through Greston, Statera wish to strengthen the strategic support in relation to liaising with third party organisations, particularly Local Fire and Rescue Services, to assist in achieving a safer, more standardised, effective, efficient approach to the planning, building, commissioning, and operational delivery associated with their Battery Energy Storage Systems (BESS).
- 20.** In relation to the East Claydon Storage, whilst the BFRS is not a statutory consultee in relation to this project, early engagement has commenced, and they have welcomed the opportunities to work and engage with Statera.
- 21.** The design principles which this application has been based builds on the Applicants experience in building and operating BESS facilities across the UK. This is summarised below.
- 22.** The spacing of containers will be based on National Fire Protection Association standard NFPA855 (standard for the installation of stationary energy storage systems) which requires 10ft/3m separation between containers. NFPA855 is a commonly applied and well-respected standard for batteries in the UK.
- 23.** The likely battery technologies have also been tested to UL9540A to rack level and the Lithium Iron Phosphate chemistry does not exhibit thermal runaway until temperatures are in the region of 150-200 degrees C, which is well above all thermal cut outs, and almost certainly never to be seen in operation.
- 24.** The batteries themselves also have overtemperature protection and fire suppression initiation, which operates as follows, again well below thermal runaway temperatures:
- Level 1 @54°C: reporting the warning message.
 - Level 2 @57°C: reporting the warning message mean while request to reduce the charge/discharge power by 50%.
 - Level 3 @60°C: force open the relay.

See below for the description of the fire suppression initiation. It is initiated on temperature and /or smoke detection:



FIRE LIAISON FRAMEWORK

25. Statera have a set of professional and sound underlying fire risk and response principles which underpin their Fire Liaison Framework (FLF). They are as follows:

- a) Compliance with the Regulatory Reform (Fire Safety) Order 2005
- b) All operations carried out by Statera Energy Ltd are in accordance with the requirements of all applicable UK Health Safety & Environmental legislation.
- c) Statera BESS sites comply with the Dangerous Substances and Explosive Atmospheres Regulations
- d) Statera use the National Fire Protection Association (NFPA) NFPA855 - standard commonly applied for batteries in the UK
- e) Early and full engagement with the local fire and rescue service associated with the site in question at the pre-planning, planning, commissioning, and day to day operational management of the site
- f) Early (preplanning) discussions with Fire and Rescue Services (FRS) to ensure the latest technology, information, operational and environmental excellence can be integrated into plans and deployed across all sites
- g) Once planning is approved, a detailed Integrated Fire Risk Management Strategy (IFRMS) will be published by the Applicant once a manufacturer is chosen.
- h) Produce Fire and Smoke modelling and reporting to accompany the planning application.
- i) Once built and under operation, continuing engagement with the local fire and rescue service to supply information (inside the Site, and situated away from the BESS themselves), a 'Premises Information Box' which include hard copies of all relevant information relating to safety and incident management
- j) Build on existing designs to include spacing of containers to reduce the likelihood of a fire spreading from one container to another

- k) Environmental impact of firefighting will include environmental protection measures to reduce the impact of a fire
- l) Environmental damage limitation from firefighting water run-off has been taken into account and incorporated into this application.
- m) The layout and provision of water supply complies as far as reasonably practicable with requirements of Approved Document B, specifically part B5
- n) Water supply to the site has been considered in detail through the detailed planning and the incorporation of water storage tanks is proposed.
- o) Provide sufficient access and distance for Fire Rescue Service personnel to have safe clearance when managing the fire
- p) All contractors and workers are trained on what steps to take in the unlikely event of a fire whilst they are on the Site.
- q) Strive to be 'best in class' through liaison with wider sector expertise including the Fire Industry Association (FIA)

Fire Industry Association

- 26.** The FLF ensures that Statera have access to innovative technology through the Fire Industry Association. The FIA is the primary trade association for manufacturers, installers, designers and maintainers of portable extinguishers, fire detection and fire protection systems in the UK. Their objective is to promote, improve and perfect fire protection methods, devices, and services. They are Europe's largest fire safety association. They promote and shape legislation and the professional standards of the fire industry through close liaison with government and official bodies, as well as other key stakeholders.
- 27.** Through the FIA, Statera will have access to the latest technology concerning thermal rise, smoke and fire detection systems. Additionally, the latest technology concerning fire suppression within the containers can also be deployed. This will include an assessment of the following possible solutions and subject to feasibility and practicability:
- Refinement of clearance between containers
 - Inert gas suppression systems
 - Internal smart thermal detectors and monitoring systems
 - Smoke detectors/on-site and remote alarm panels
 - Off-site monitoring system
 - Automatic fire suppression system
 - Internal fire/smoke dampers
 - Gas fire suppression systems including dry misting systems
 - Internal fire rated panels

Early and Full Engagement with the BFRS

28. As previously discussed, although BFRS are not a statutory consultee in relation to this project, one of Statera underlying principles is 'Early and full engagement with the local fire and rescue service associated with the site in question at the pre-planning, planning, commissioning and day to day operational management of the site'. To achieve this Statera have deployed a three staged stepped approach to their FLF. In conjunction with Greston, Statera are developing a long-term approach whereby fire and rescue liaison takes place throughout the complete cycle associated with the BESS planning, implementation, and operational phases. This would include liaison and support at pre-planning, planning submission and multi-agency liaison, commissioning, and operational delivery (business as usual) of the BESS.

Therefore, the FLF approach and methodology consists of three strategic areas.

- Pre-planning
- Site Commissioning (post planning approval)
- Operational Delivery

The Statera FLF approach morphs seamlessly between phases. A breakdown of inputs, outputs and outcomes associated with the three phases is detailed below:

Pre-planning

29. Pre-planning includes such services as:

- a) Working with National Fire Chiefs Council (NFCC) to establish latest thinking and best practice in relation to planning, protection, monitoring and operational emergency response
- b) Liaison with the local FRS to exchange early information at the planning and design stage and to enhance professional understanding
- c) Gathering information and intelligence from the wider FRS sector including the Fire Industry Association
- d) Working with Fire Industry Association concerning latest technology, passive and active fire systems to ensure Statera remains at the forefront of innovation
- e) Reviewing and refreshing recommendations/changes to Fire Safety and Fire Response Strategies
- f) Help support fire and firefighting related information as part of any environmental impact survey or assessment

Site Commissioning (once planning is approved)

30. Site Commissioning includes such services as:

- a) Continue to work with the NFCC to 'bring to life' the ability and effectiveness of standardisation of approach. Help establish the 'Statera best in class industry standard' concerning site safety, protection, monitoring and response activities
- b) Continuing liaison with local FRS Fire Protection, Risk Intelligence and Operational Response departments

- c) Liaison with local response crews to establish a trusting relationship and to help build information and technical/professional understanding

Operational Delivery

31. Operational Delivery includes such services as:

- a) Continuous liaison with FRS to support the discharge of their responsibilities under the Fire and Rescue Services Act 2004 (FRSA)
- b) Support the FRS to obtain and gather Site Specific Risk Information (SSRI) as required under Section 7iid of the FRSA.
- c) Support operational personnel with awareness training on the content and emergency use of the Site-Specific Risk Information (SSRI)
- d) Liaison with the FRS to ensure a suitable 'Initial Call Receipt' (999) and mobilisation policy (pre-determined attendance of resources)
- e) Liaise with the FRS to ensure world class and contemporary Operational Response Procedures and Emergency Response Plan
- f) Oversee local FRS site visits and training exercises until local continued professional development (CPD) has been achieved
- g) On-going liaison with local response crews to continue building a trusting relationship and to help maintain information and technical/professional understanding. Liaison to include induction and site awareness training for new staff members of the local crews who are most likely to attend the incident until local CPD is achieved
- h) Support multi-agency discussions as required under the Civil Contingencies Act 2004
- i) Continue liaison with local FRS Fire Protection, Risk Intelligence and Operational Response Departments until local CPD has been achieved

CONCLUSION

- 32.** There is clear commitment by the Applicant to establish a Fire Liaison Framework and expand its consultation during the planning process to the local fire service and stakeholders. This has been welcomed by BFRS.
- 33.** This framework achieves a comprehensive, contemporary, and effective approach to the planning, building, commissioning, and operational delivery associated with their BESS sites building on Stateras record of delivering best in class facilities already in operation.
- 34.** Additionally, the local FRS will benefit from detailed liaison which ensures the fire protection approach, operational training and operational response policies and procedures are specific to the site and 'best in class'. Such an approach also maximises firefighter safety and minimises any environmental impact in the unlikely event of an incident occurring. Exchange of site information can also be provided to other agencies therefore supporting and discharging the responsibilities of those public bodies under the Civil Contingencies Act.

Report written by: Dave Etheridge OBE, FIFireE, MIOSH

Date: March 2023

APPENDIX A

From: Dave Etheridge
Sent: 27 April 2023 12:25
To: Tuffley, Simon <stuffley@bucksfire.gov.uk>
Subject: RE: {EXTERNAL} - RE: Statera Fire Liaison Framework

Simon,

Thankyou for your prompt and positive response.

On behalf of Statera, we look forward to working with Bucks Fire and Rescue Service concerning this project, and I will be back in contact with you in due course as the initial single point of contact.

Thanks again for your time to date.

Dave

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From: Tuffley, Simon <stuffley@bucksfire.gov.uk>
Sent: 26 April 2023 10:39
To: Dave Etheridge <dave.etheridge@greston.co.uk>
Subject: RE: {EXTERNAL} - RE: Statera Fire Liaison Framework

Hi Dave,

Apologies that it has taken a couple of weeks to get back to you. I have been out of service and wanted to discuss the proposal with colleagues.

We would be more than happy to engage with you through the liaison framework, as it is a proactive way of managing these emerging risks. It was refreshing to hear about the site with a few years notice, rather than other sites which are opening imminently, without much prior notice. Our only concern is the scale of production over the coming months/years, with other companies, and being able to capture all of that through a single method. As you suggested, the NFCC will play a vital role here.

Happy to progress our liaison, and I'm happy to be the SPOC for BFRS.

Best regards,

Simon

From: Dave Etheridge <dave.etheridge@greston.co.uk>
Sent: 26 April 2023 10:15
To: Tuffley, Simon <stuffley@bucksfire.gov.uk>
Subject: {EXTERNAL} - RE: Statera Fire Liaison Framework

CAUTION: This email originated from outside of Buckinghamshire Fire and Rescue. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Morning Simon,

I hope you are well and your week has been a positive one so far.

Sorry to clog up your inbox but I wondered if you could update me on a response to my email below in relation to the proposed Fire Liaison Framework.

As always, please feel free to give me a ring if there is anything you would like to discuss or receive further clarification over.

Many thanks Simon.

Dave

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From: Dave Etheridge
Sent: 14 April 2023 09:42
To: Tuffley, Simon <stuffley@bucksfire.gov.uk>
Subject: Statera Fire Liaison Framework

Simon,

Firstly, thank you for your valuable time during our online meeting today to introduce you to the Statera Fire Liaison Framework (FLF) which we also have in place with Devon and Somerset Fire and Rescue Service (DSFRS).

As discussed, Statera Energy Ltd appointed Greston Associates in February 2023 to complement and enhance their approach to working with all stakeholders concerning current and future sites. Through Greston, Statera wish to strengthen the strategic support in relation to liaising with third party organisations, particularly Local Fire and Rescue Services, to assist in achieving a safer, more standardised, effective, efficient approach to the planning, building, commissioning, and operational delivery associated with their Battery Energy Storage Systems (BESS).

Whilst the Fire and Rescue Service is not a statutory consultee in relation to BESS projects at the planning stage, Statera recognised that early (preplanning) discussions with Fire and Rescue Services (FRS) will ensure the latest technology, information, operational and environmental excellence can be integrated into plans and deployed across all future sites.

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- l) Environmental damage limitation from firefighting water run-off has been taken into account and incorporated into this application.
- m) The layout and provision of water supply complies as far as reasonably practicable with requirements of Approved Document B, specifically part B5
- n) Water supply to the site has been considered in detail through the detailed planning and the incorporation of water storage tanks is proposed.
- o) Provide sufficient access and distance for Fire Rescue Service personnel to have safe clearance when managing the fire
- p) All contractors and workers are trained on what steps to take in the unlikely event of a fire whilst they are on the Site.
- q) Strive to be 'best in class' through liaison with wider sector expertise including the Fire Industry Association (FIA)

Statera will have access to the latest technology concerning thermal rise, smoke and fire detection systems. Additionally, the latest technology concerning fire suppression within the containers can also be deployed. This will include an assessment of the following possible solutions and subject to feasibility and practicability:

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Early and Full Engagement with the Buckinghamshire Fire and Rescue Service (BFRS)

As previously discussed, although BFRS are not a statutory consultee in relation to this project, one of Statera's underlying principles is 'Early and full engagement with the local fire and rescue service associated with the site in question at the pre-planning, planning, commissioning and day to day operational management of the site'.

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The liaison framework achieves a comprehensive, contemporary, and effective approach to the planning, building, commissioning, and operational delivery associated with their BESS sites building on their record of delivering best in class facilities already in operation.

Additionally, BFRS will benefit from detailed liaison which ensures the fire protection approach, operational training and operational response policies and procedures are specific to the site and 'best in class'. Such an approach also maximises firefighter safety and minimises any environmental impact in the unlikely event of an incident occurring. Exchange of site information can also be provided to other agencies therefore supporting and discharging the responsibilities of those public bodies under the Civil Contingencies Act.

When we discussed your areas of responsibility for BFRS, it would appear you are the right single point of contact (SPOC) for Staterra going forward. I would be very grateful if you could confirm the above and also your approval of the Fire liaison Framework as an appropriate methodology for ongoing dialogue and information exchange with BFRS.

My thanks again for your time today, it really is appreciated and I look forward to continuing to work with you concerning this project area.

Dave

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