



Kent Fire &
Rescue Service

together

To
Planning Applications
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Contact
Fire Engineering Team
Direct line
01622 212421
Email
FET@kent.fire-uk.org

Our ref
CAS-330370
CAS-326600
Your ref
20250730
Date
16 October 2025

FAO: Amanda Cue

Dear Amanda,

BESS Planning application

Re: Land adjacent to, Thames Way, Northfleet, Gravesend, Kent, DA11 8HN.

Thank you for your follow up email dated 26/09/2025 with the provision of an executive summary of the Outline Battery Safety Management Plan (OBSMP).

This planning consultation is for the installation of electricity infrastructure including a Battery Energy Storage System (BESS) with an unspecified storage capacity, a substation and ancillary electrical infrastructure. Please be aware that the principles discussed within this planning advice letter should not be used as a precedent for justification for future developments. Each BESS is unique and should be evaluated on its own merit.

Kent Fire Rescue Service (KFRS) has no authority to approve or decline planning permission for grid scale BESS sites or smaller BESS cabinets. This decision, in the majority of cases, lies with the Local Authority or National Infrastructure Planning. KFRS will endeavour to provide consultation during this process, however, there is no statutory requirement to do so. Information requested and received will be able to support our observations during the planning process and also provide a basis for design/build stage. I acknowledge that KFRS are also learning and developing along with this evolving area of technology and approaches to risk mitigation for BESS locations.

With this in mind, as this is currently in the early stages of the project, we would encourage the design team to reach out for early engagement. This has proven to be beneficial for both parties in regard to expectations and enabling KFRS to assist from a fire safety perspective.

Confidential Information

Information requested by KFRS will be used to both aid in the design process and influence the emergency response at an incident. It is acknowledged that some specific details may be

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commercially sensitive, and so the information requested is kept in confidence on our secure system throughout the consultation process. It is also acknowledged that some key features of the design may not be finalised in the early stages of planning, due to evolving technology and/or procurement of equipment. However, some important information is requested during the initial stages of planning. Please note that KFRS has amended our standard response letter to streamline and co-ordinate the applicants' responses to key safety points at various stages of the development.

Information Requested

During the initial stages of planning, KFRS request that the following information is provided by your applicant in the form of an email response, via yourselves as the Authority Having Jurisdiction (AHJ) to the Fire Engineering Team (FET) email. I note some of this information has been provided by your client.

1. Identification of who is at risk from the proposed site
2. Identification of any surrounding communities, sites, and infrastructure that may be impacted as a result of an incident
3. A detailed diagram / plan of the site
4. Access to, and within, the site for FRS appliances
5. Evidence that site geography has been considered (e.g. prevailing wind conditions).
6. How the BESS units will be laid out relative to one another.
7. Details of fire-fighting water provisions (e.g. Flow rates, static tanks, hydrants, fire mains)
8. The intended fire strategy in the event of thermal runaway (e.g. controlled burn with boundary cooling or internal water suppression)
9. An outline emergency response plan (ERP) reflecting the NFCC Grid scale guidance

Additional information is also requested as the project develops and prior to project completion. Please can your applicant complete the [additional information page](#) at the end of this letter, clearly providing risk mitigation details where their proposal deviates from the NFCC Grid Scale guidance or other international design codes. Please can the completed document be returned to the FET, via the local authority planning team prior to completion.

Please don't forget to notify KFRS, via the FET email, when...

- Site construction begins; so that we can update our system and make crews aware of site access location(s).
- Following delivery of the initial phase of BESS containers; so that we can update our system of the potential increased risk at the site.
- Project completion/activation; so that our Risk Inspection Team (RIT) can complete a Site-Specific Risk Information (SSRI) visit and align our operational response with the applicant's emergency response plan (ERP).

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Specific Planning Observations

Access

I note *Table One* states there will be two separate vehicle access points, with mention of prevailing winds that have been accounted for to ensure KFRS can access the site in the event of an incident. Therefore, access appears suitable and broadly in-line with NFCC guidance.

Water supplies

I refer back to the initial Proposed Site Layout plan where I can see the provision of a water tank upon each entrance into the site which based on your comments would be 180m³ and therefore appears suitable and in-line with NFCC guidance.

Contaminated water

Consideration should be given within the site design to the management of water run-off (e.g. drainage systems, interceptors, bunded lagoons etc).

Battery Safety Management Plan (BSMP) and Emergency Response Plan (ERP)

Please can you confirm the MW of this BESS site as there is no mention within the Outline Battery Safety Management Plan (BSMP). We accept that this is a developing document due to the overall design not being currently finalised due to evolving technology and/or procurement of equipment. As such, the documents provided are an “evolving document” to assist KFRS in helping your applicants design team in developing a finalised BSMP and robust ERP. I note that there is no ERP currently available, and as such would expect an outline ERP at the planning stage to broadly align with NFCC grid scale guidance document.

Important points about this consultation

Currently, no British Standard (BS) or Approved Document (AD) specifically addresses the installation of BESS. Importance is therefore placed on evidence-based justification to support the design. In lieu of this, the following guidance has been adopted to provide the basis for our observations.

- **National Fire Chiefs Council (NFCC) published guidance: Grid Scale Battery Energy System Planning, Guidance for FRS – Published April 2023***
- **Department for Energy Security & Net Zero: Health and Safety Guidance for Grid Scale Electrical Energy Storage Systems- Published March 2024***



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*Please note that this detailed document should not be considered as a fully comprehensive specification; but should be used to provide a framework for consultation. Each BESS site should be assessed individually and addressed on a case-by-case basis.

The contents of this guidance utilise academic study, international standards, case studies and industry guidance to support professional judgement.

I would like to thank you again for your early engagement and in advance for your engagement throughout the planning process. KFRS advice is non-statutory but given in good will to protect the lives and safety of the public and emergency responders.

If you require any further advice, please contact this office using the details above. Please be aware that the Building Safety office hours are 09:00-17:00 Monday to Friday

Yours sincerely,

Fire Engineering Team

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To be returned, by the AHJ via the FET@Kent.fire-uk.org

NFCC Recommendations / Additional Information	Applicants mitigation comments and risk measures where applicable.
1. The battery chemistries being proposed e.g. lithium-ion Phosphate (LFP), Lithium Nickel Manganese Cobalt Oxide (NMC)). Because: a) Battery chemistries will directly affect the heat released when a cell goes into thermal runaway b) Battery chemistries will influence vapor cloud formation. c) An understanding of the battery chemistry is useful when requesting scientific advice during an incident	
2. The battery form factor (e.g. cylindrical, pouch, prismatic)	
3. Type of BESS e.g. container or cabinet	
4. Number of BESS containers/cabinets	
5. Size/capacity of each BESS unit (typically in MWh)	
6. How the BESS units will be laid out relative to one another.	
7. A detailed diagram / plan of the site.	
8. Evidence that site geography has been taken into account (e.g. prevailing wind conditions).	
9. Access to, and within, the site for FRS assets	
10. Details of any fire-resisting design features	
11. Details of any: a) Fire suppression systems b) On site water supplies (e.g. hydrants, EWS etc) c) Smoke or fire detection systems (including how these are communicated) d) Gas and/or specific electrolyte vapour detection systems e) Temperature management systems f) Ventilation systems g) Exhaust systems h) Deflagration venting systems.	
12.Final Emergency Response Plan	
13.Final Battery Management Plan	

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