

Eastleigh Borough Council
(Development Management)
Eastleigh House Upper Market Street
Eastleigh
Hampshire
SO50 9YN

October 10, 2025

Dear Mr. Chapman,

**CONSTRUCTION OF A STANDALONE CONTAINER TO HOUSE BATTERIES
ASSOCIATED WITH STORING THE SOLAR ENERGY FROM THE SOLAR PANELS.
HIGH WOOD RESERVOIR, ALLINGTON LANE, SOUTHAMPTON, SO30 3HQ**

RESPONSE TO EA LETTER DATED 24TH SEPTEMBER 2025

As the provider of the energy storage system proposed for the above development, we would offer this response to the concerns and risks mentioned by the EA in their letter and provide assurances to the council regarding the level of those risks and the mitigations already in place.

Much of the emerging and evolving guidance around fire risk, and mitigation of battery fires, is based on the assumption that the underlying chemistry and design of the batteries systems will lead to an uncontrollable thermal runaway in the event of a major fault within the system. However, fire risk has diminished greatly in recent years, through better design and material choice which has then been thoroughly tested.

The single 20ft container system we are supplying has recently been through a full, attempted, destructive fire test under the strictest set of circumstances, all overseen by the international UL Solutions authority. UL sets the highest standards for battery safety with its UL9450 standard.

The container is made of battery racks. The racks have multiple battery modules, and the modules are constructed from small multiple battery cells. The test forced a cell to fail and heated it sufficiently to force a fire, with all container doors open and all fire suppression systems deactivated. Despite a localized high temperature fire, it did not propagate throughout the test container and did not damage other containers that were positioned right up against the test container.

With the multi-level protections within the container and a highly effective aerosol-based fire suppression system (not water), the risk of fire spreading beyond the container and the risk of ground water contamination is negligible.

Many of the reported battery fires are from legacy systems that were not built to the standards they are today. To quote from a recent study by the American Clean Power Alliance ("Assessment of Potential Impacts of Fires at BESS Facilities" April 2025) of 35 battery related fires between 2012 and 2024, they concluded the following: -

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“...Available data suggests that failures primarily stemmed from system integration, construction, and assembly issues rather than fundamental battery chemistry concerns.”

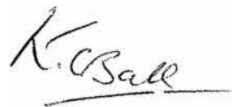
“Newer ESS units benefit from improved safety measures, such as advanced thermal management, suppression systems, and containment enclosures, significantly reducing the likelihood of large-scale incidents.”

“Unless there is direct suppression water applied to the BESS on fire, any cooling water applied will be similar to rain and no potential contaminants will be included in any runoff. While lithium-ion battery fires produce chemical byproducts, studies show that their solubility in water is low, limiting the potential for groundwater contamination if direct suppression efforts are performed.”

Conclusion

This project has a single battery container, built with the latest and highest standards of fire safety by design, and that design has been recently fully tested and demonstrated to be completely robust.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'K. Ball'.

Kevin Ball
Chief Commercial Officer