

AGR

**Priory Farm Solar Array
Battery Safety Management Plan**

**AGR Solar 4 Limited
September 2025**

Priory Farm Solar Array - Battery Safety Management Plan

SUMMARY:

This Battery Safety Management Plan has been completed by AGR Renewables as the Principal Designer appointed by AGR Solar 4 Limited under the Construction (Design and Management) Regulations 2015 in relation to the 'grid-scale' Battery Energy Storage System located on Land to the North and East of Great Wymondley, adjoining Graveley Lane, Hertfordshire, to ensure that:

- Appropriate communications with regulatory bodies are in place, including but not limited to Hertfordshire Fire and Rescue service throughout the whole life cycle of the facility
- Access, health and safety (including emergency incident response), environmental and quality systems are in place for the successful design, construction, testing and commissioning of the facility
- Appropriate access, health and safety (including emergency incident response), environment and quality systems are in place for the operation & maintenance phase of the facility
- Appropriate measures are in place for how the facility will ultimately be decommissioned considering health and safety (including emergency incident response) and environmental matters.

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AMENDMENT RECORD			
REVISION	DATE	CHANGE FROM PREVIOUS REVISION	PURPOSE OF REVISION
0	01/09/2025	None – First draft for Internal Review	N/A
1	17/02/2026	Various.	Updated to reflect latest Site layout and Battery supplier.
2	11/03/2026	Name of the project changed from Wymondley Solar farm to Priory Farm Solar Array.	To align with the project name used across other planning and other regulatory documents.

1.0 Introduction

- 1.1 AGR Solar 4 Limited is developing the Priory Farm Solar Array project, which includes a Battery Energy Storage System (“BESS”). The project was granted planning permitted by the Secretary of State under planning application ref: 21/03380/FP, on land at Graveley Lane and East of Great Wymondley in Hertfordshire.
- 1.2 The AGR Group of companies, which AGR Solar 4 and AGR Renewables is part of, has developed, maintains and operates renewable energy assets across the UK, both for itself and other third party clients (like financial institutions). The construction of these assets, and it will be the same with the Priory Farm Solar Array and BESS facility, is managed in accordance the Construction (Design and Management) Regulations 2015 (“CDM”). AGR has built good relations with the various county council Fire and Rescue services that cover the location of its assets. The kind of relationships AGR has with other Fire and Rescue services is in place with Hertfordshire Fire and Rescue service (“HFR”) too.
- 1.3 In preparing this document, officers from AGR, have already opened dialogue with the Community Fire Protection Team at HFR. This document sets out how that engagement continues throughout the whole life cycle of the asset, providing HFR the opportunity to be involved in and satisfied with how AGR ensures health, safety and environmental matters are protected, and how AGR responses to emergencies if such an unlikely event were to occur.
- 1.4 This document, thereafter, referred to as the Battery Safety Management Plan (“BSMP”), has been prepared by AGR Renewables as the Principal Designer appointed by AGR Solar 4 Limited under the Construction (Design and Management) Regulations 2015 in relation to the Battery Energy Storage System at Priory Farm Solar Array to ensure that:
 - Appropriate communications with regulatory bodies are in place, including but not limited to Hertfordshire Fire and Rescue service throughout the whole life cycle of the facility
 - Access, health and safety (including emergency incident response), environmental and quality systems are in place for the successful design, construction, testing and commissioning of the facility
 - Appropriate access, health and safety (including emergency incident response), environment and quality systems are in place for the operation & maintenance phase of the facility

- Appropriate measures are in place for how the facility will ultimately be decommissioned considering health and safety (including emergency incident response) and environmental matters.

2.0 BESS Fire Strategy

2.1 This BSMP does not seek to set out all the various legislation the facility is required to adhere to. It is not the purpose of this document to consider the technical or engineering details involved. This BSMP focuses on AGR's approach in relation to the management of BESS safety, which it does principally through compliance with legislation under:

- Health and Safety at Work Act
- Dangerous Substances and Explosive Atmospheres Regulations
- Electricity at Work Regulations
- Management of Health and Safety at Work Regulations
- Construction (Design and Management) Regulations
- Dangerous Substances (Notification and Marking of Sites) Regulations

2.2 The UK's Health and Safety Executive ("HSE") provides guidance about Grid-Scale BESS, which also links through in relation to Hertfordshire Fire and Rescue the guidance provided by the National Fire Chief Council ("NFCC"). AGR's adheres to the guidance provided by the HSE and NFCC.

2.3 AGR understands the duties it has and implements management controls to ensure the health and safety of all staff, contractors and visitors to its construction sites or operational facilities. AGR implement's its BESS Fire Strategy in four distinct phases. Namely:

Phase One – Pre-Construction

At the time of writing the project is in this phase. AGR Renewables as Principal Designer is supporting the 'Client' (AGR Solar 4) under CDM to ensure that adequate resources and time are provided to deliver the project safely, assessing the professional competency of the contractors AGR Solar 4 is considering to ensure that only suitably qualified and competent contractors are appointed for the work they may be contracted to undertake, and only appropriate equipment is procured in line with EU (CE)/UKCA standards and certifications.

Phase Two - Construction, Testing and Commissioning of the asset

This work is led by the Project Delivery Team within AGR Renewables and involves the management of specialist EPC contractors and equipment suppliers appointed by AGR Solar 4. AGR Renewables is the Principal Designer under CDM for the Priory Farm Solar Array construction project. The

Principal Contractor for this project is Four-Square Projects Limited. A summary of the Principal Contractor's duties in relation to BESS safety are set out later in this document.

Phase Three - Operation and Maintenance of the live asset

AGR Renewables Asset Management team will manage the operational and maintenance phase of the asset 24 hours each day all year round. This team will manage and coordinate specialist contractors carrying routine and reactive maintenance, including emergency incident response.

Phase Four - Decommissioning and removal of the asset

The solar farm has a 40 year life, after which in accordance with a schedule of works, referred to as the 'End of Life Removal Scheme' ("EoLRS"), the asset will be decommissioned, removed and the land restored to its original condition.

The details of EoLRS do not form part of this BSMP at this stage. The EoLRS will be developed nearer the end of the asset's life and submitted to the Local Planning Authority at least one year in advance of the asset becoming non-operational.

- 2.4 The following sections of this document set out the details of phases one, two and three above.

3.0 BESS Pre-Construction

- 3.1 The provision of the BESS is split into two contractual elements. AGR Renewables is responsible for the Design, Procurement and Construction of the overall BESS facility, the so called Balance of Plant (BoP). The Client is contracting the supply of the battery containers and all required ancillary control equipment.
- 3.2 The battery containers, control equipment and Switchroom, which the solar farm connects to as well, all sit within a 'compound'. The basic layout of the compound and how it is accessed from the wider public highway network is shown on the approved planning layout and supporting drawings / documents.
- 3.3 The battery containers will be provided by a manufacturer called Trina ESS. Appendix A includes a copy of the Manufacturer's Manual. This sets out their overall design specification and the measures contained in relation to minimising the risk of fire or explosion.
- 3.4 As part of the duties of AGR Renewables, as Principal Designer, on another one of AGR's project staff have visited Trina's manufacturing facility to witness the Factory Acceptance Testing of the Battery Containers. This testing is carried out prior to the shipment of the units to site. Staff from AGR will do the same for the Battery Containers intended for the Priory Farm Solar Array project when they are being manufactured later in 2026.

4.0 **BESS Construction, Testing and Commissioning**

4.1 During this phase AGR Renewables, as Principal Designer, will lead the following processes during the detailed design stage:

- Designers Risk Assessment, including the compilation of a Residual Risk Register.
- Hazard and Operability Studies ("HAZOPs")

4.2 AGR Solar 4 (the Client under CDM) has appointed Four-Square Projects Limited as the Principal Contractor to manage the safe construction of the solar farm and BESS project.

4.3 The Principal Contractor will prepare and implement a Construction Phase Plan ("CPP") under CDM. The CPP builds upon the various approved planning documents and sets out how the site will be managed day to day and the Health and Safety managements systems and procedures that all contractors working on the site will be required to adhere to.

4.4 This BSMP does not seek to set out all the matters covered in the CPP. However, in relation to battery safety the following elements will form part of the CPP:

- Appointment of Responsible Persons
- General Fire Precaution
- Application to identified premises
- Pre-Construction Fire Risk Assessment
- Compilation of the Fire Risk Management Plan
- Consultation with LFR, including opportunities for site visits during the construction and testing of the facility (prior to commissioning)
- Construction Site Fire Risk Assessment and requirements for Suppliers and Contractors (pre-Qualification)
- Preparation and implementation of Construction Phase Emergency Response Plans
- Application of all required resources to enable all duties to be effectively executed
- The provision of managerial arrangements for auditing and inspections to achieve all due diligence regarding the discharge of duties under both CDM and the Regulatory Reform (Fire Safety) Order 2005.

4.5 During this phase to comply with Section 7(2) of the Fire and Rescue Services Act 2004 AGR will ensure HFR has access to up to date information about the BESS facility and is supported in any training and 'incident planning' exercises they require so that both AGR and HFR can ensure safe and effective response to any future emergency. HFR will have the opportunity to visit the construction site during this phase at any time, including during testing and commissioning, and have access to any design or technical information they require for their own purposes.

- 4.6 HFR, like all other visitors to the construction site, will be required to undertake a Site Induction by the Principal Contractor and abide by AGR's Site Rules at all times.
- 4.6 A Fire Risk Management Plan ("FRMP") and Emergency Response Plan ("ERP") has been drafted for the Priory Farm Solar Array BESS facility. This follows the format AGR uses across all of its assets in the UK. A copy of the FRMP / ERP is attached as Appendix B. This document is a live document and will be updated as and when required during the life of the facility. The document in Appendix B is a Pre-Construction version and will be one of the reference documents used by the Principal Contractor during this phase under their CPP.
- 4.7 During the final stages of this phase AGR Renewables, as Principal Designer, will prepare the Health and Safety File for the facility under CDM. This file will be for the site owners AGR Solar 4. It will contain design information and all the necessary information regarding the ongoing operations of the site, what equipment was used and all manufacturers operational manuals.
- 4.8 In terms of safety, including battery safety, the Health and Safety File will contain copies of the Designers Risk Assessments, the Residual Risk Register and HAZOPs. The Pre-Construction FRMP and ERP will be developed and updated during this phase to ensure fire safety precautions and procedures accord with the detailed design and any matters that arose during testing and commissioning.
- 4.9 As part of the detailed design, and in line with what AGR does at all of its assets a 'Gerda Box' with FEE-1 type key containing significant ERP information will be provided close to each Site Access both north and south of Graveley Lane. The exact position will be determined in liaison with HFR during the construction phase.
- 4.10 The Gerda Box will contain:
- Description of the BESS facility and Site Plans
 - Details of Key Personnel and Emergency Contacts
 - Details of fire safety systems, alarms, and suppression systems
 - The location and details of any COSSH materials stored on site
- 4.11 Signage at the Site Access and at each 'BESS Compound' will include 24hr Emergency Contact number.

5.0 **BESS Operation and Maintenance**

- 5.1 AGR Renewable's Asset Management Team will manage the operation and maintenance of the Priory Farm Solar Array and BESS facility.
- 5.2 AGR's basic strategy in terms of emergency incident management on its live sites, which will include Priory Farm Solar Array is:

First Priority - Protect Life

Second Priority – Prevention of harmful emissions to the Environment

Third Priority – Protection of Property

- 5.3 Given the isolated location of the BESS at Priory Farm Solar Array, remote from residential buildings the approach, in the unlikely event that a fire was to occur, would be to allow the fire to burn out and only provide cooling water to adjacent assets such as inverters and other BESS containers. This approach is known as a “Controlled Burn”.
- 5.4 The relationship AGR has with HFR will continue throughout the operational phase of the asset. AGR’s Asset Management Team will liaise with HFR to ensure any training required is identified including firefighting capability and emergency response, which may also require regular drills.
- 5.5 The Residual Risk Register produced by AGR Renewables as Principal Designer will be used to produce safe systems of work and Permits to Work (PtW) all in accordance with legislation current at that time such as the Electricity Regulations. AGR Asset Managers will be responsible for the updated the FRMP / ERP should any matters change on site during this phase and for keeping FRFS informed.
- 5.4 In the unlikely event that an Emergency Incident occurs the initial assessment of incident will record the following: -
1. Has the suppression system activated?
 2. Is the container on fire?
 3. Supply a number or any other unique identifier that can be used by the remote monitoring system so that the Fire Service can reference this when returning calls to the remote-control service or other emergency services.

6.0 Conclusion

6.1 This Battery Safety Management Plan (“BSMP”) sets out how AGR Solar 4 will ensure that:

- Appropriate communications with regulatory bodies are in place, including but not limited to Hertfordshire Fire and Rescue service throughout the whole life cycle of the facility
- Access, health and safety (including emergency incident response), environmental and quality systems are in place for the successful design, construction, testing and commissioning of the facility
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