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Rossendale BESS

Outline Fire Prevention Plan

For Cubico UK Developments Ltd

Revision 02

Date 17 March 2025

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<i>Issued by</i>	Hydrock Consultants Limited 2 Esh Plaza, Sir Bobby Robson Way, Great Park, Newcastle upon Tyne, NE13 9BA +44 (0) 1912 302993 hydrock.com	Client	Cubico UK Developments Ltd
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<i>Prepared by</i>	Michal Krajcovic	
<i>Checked by</i>	Katherine Bogan	
<i>Approved by</i>	Craig Lobban	

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Contents

1.	Introduction	4
1.1	<i>Overview</i>	4
1.2	<i>Purpose of Report</i>	4
1.3	<i>Basis of Report</i>	4
1.4	<i>Relevant Legislation</i>	5
1.5	<i>Project Overview</i>	5
1.6	<i>Information Provided by Others</i>	7
2.	Fire Safety Design Measures	8
2.1	<i>Overall Fire Safety Strategy</i>	8
2.2	<i>Preventive Measures</i>	8
2.3	<i>Monitoring, Detection and Alarm Systems</i>	9
2.4	<i>Control Measures</i>	11
3.	Operation and Cause & Effect of the Fire Safety Measures	14
3.1	<i>Battery and Energy Management System (plus cooling system)</i>	14
3.2	<i>Deflagration Blast Protection Process</i>	15
3.3	<i>Fire Alarm and Spread Process</i>	16
4.	Summary	17

1. Introduction

1.1 Overview

This document is an outline fire prevention plan for the Rossendale BESS site near Turn Village, Lancashire, England, that summaries the design considerations for fire safety measures as part of the battery containers and the overall site operations that deal with the fire and blast hazards on the site. This details typical measures for prevention and control of the fire and for the site which can then be used to aid the site design and emergency response plan once the design is finalised.

1.2 Purpose of Report

Hydrock has been engaged by Cubico UK Developments Ltd (Cubico)' to provide fire engineering support for their proposed Rossendale Battery Energy Storage System (BESS) development. The development is a 85 MW, 2-hour BESS facility that will be connected to the National Grid Energy Distribution network via an offsite substation located on Croston Close Road, southeast of the BESS site.

This report has been prepared in support of the projects planning application and provides a high-level overview of the fire safety requirements that will be incorporated into the design of the BESS site to mitigate fire and blast hazards through both preventive and control measures. These safety measures will be designed in accordance with NFPA 855, NFPA 68, and NFCC guidance.

This report supports the development of the site's battery management plan and emergency response plan. Its primary audience is Cubico, assisting in risk mitigation strategies, overall site management, and emergency response planning. Additionally, it can serve as supporting evidence for relevant design stakeholders, including the Local Planning Authority, Health and Safety Executive, Fire and Rescue Service, and Environmental Agency.

1.3 Basis of Report

This Fire Prevention Management Plan report is based on the site location shown in Figure 1 and the illustrative layout shown in Figure 2. It provides a summary of how the fire safety elements collectively function on the site. The safety measures that are used to develop this plan within this report in terms of fire safety has been designed by the BESS manufacturer or by Cubico in terms of site layout and management.

The referenced documents used within this report that have been provided by Cubico and are tabulated in Table 1.

Table 1: Information on which the report is based on

Description	Drawing No.	Revision	Date
Pre App Presentation - Cubico UK Developments Ltd	-	-	10/24
Rossendale BESS – Indicative Fire Strategy Plan	CUB001-FS-01	01	06/03/25

1.4 Relevant Legislation

The Rossendale BESS will be developed in accordance with applicable legislation and best practice. The relevant legislation for the site will include, but is not be limited to, the following:

- » The Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR);
- » NFPA 855:2023;
- » BS 61936-1:2017;
- » The latest NFCC Grid Scale Battery Energy Storage System planning – Guidance for FRS (including the draft guidance from July 2024);
- » UL 9540A;
- » NFPA 68.

1.5 Project Overview

The proposed Rossendale development is a new battery storage system (BESS) in the proximity of Turn Village, Lancashire, England. The address of the site is land at Rochdale Road and Bamford Road, Turn Village.

The site will consist of the following items:

- » BESS compound containing:
 - » BESS Containers;
 - » Power conversion system units, inverters, and switchgear units;
 - » Substation building;
 - » Storage Container(s);
 - » Auxiliary Transformer;
 - » BESS Substation Compound.

The site location is shown in Figure 1.

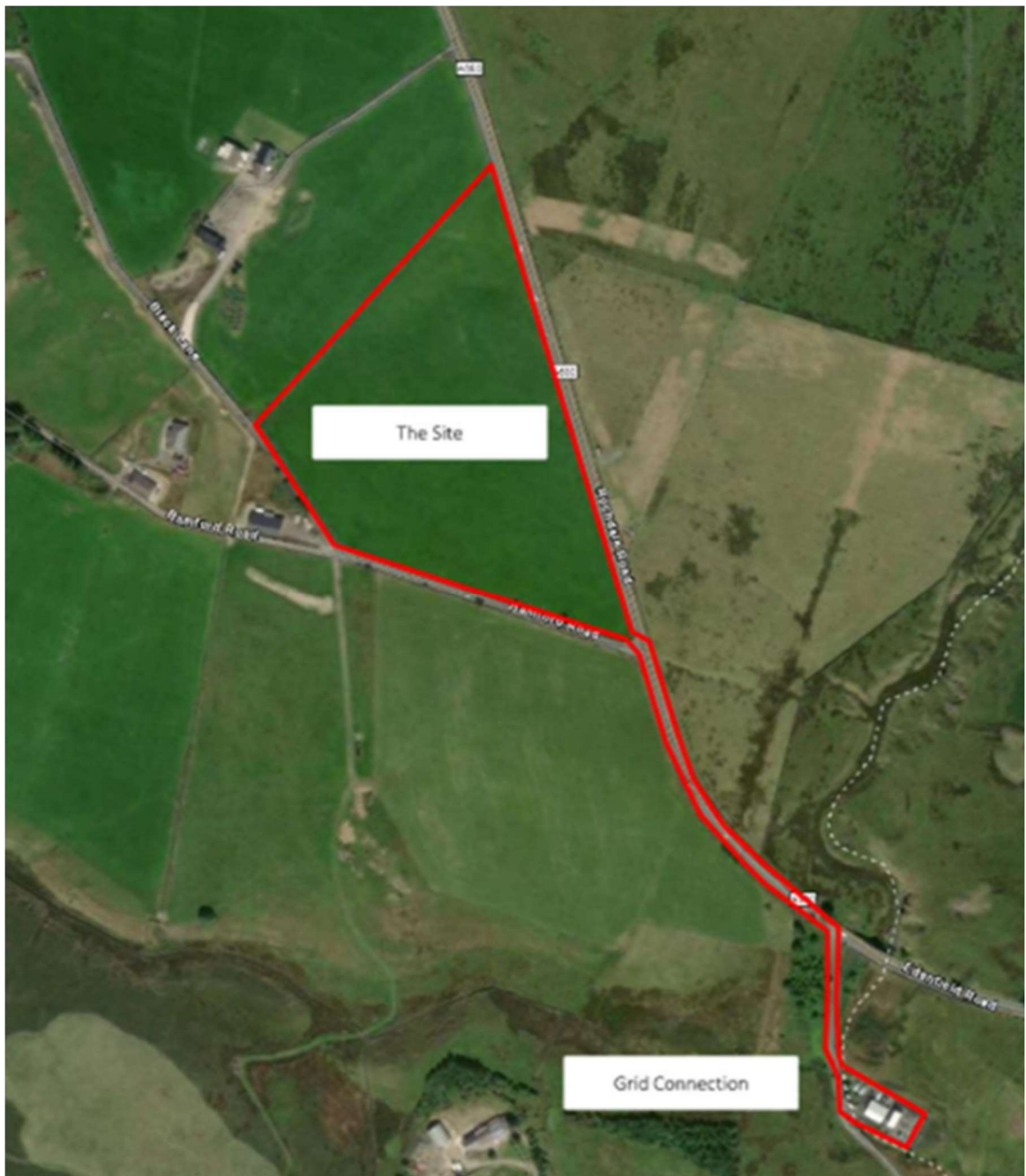


Figure 1 Site Location

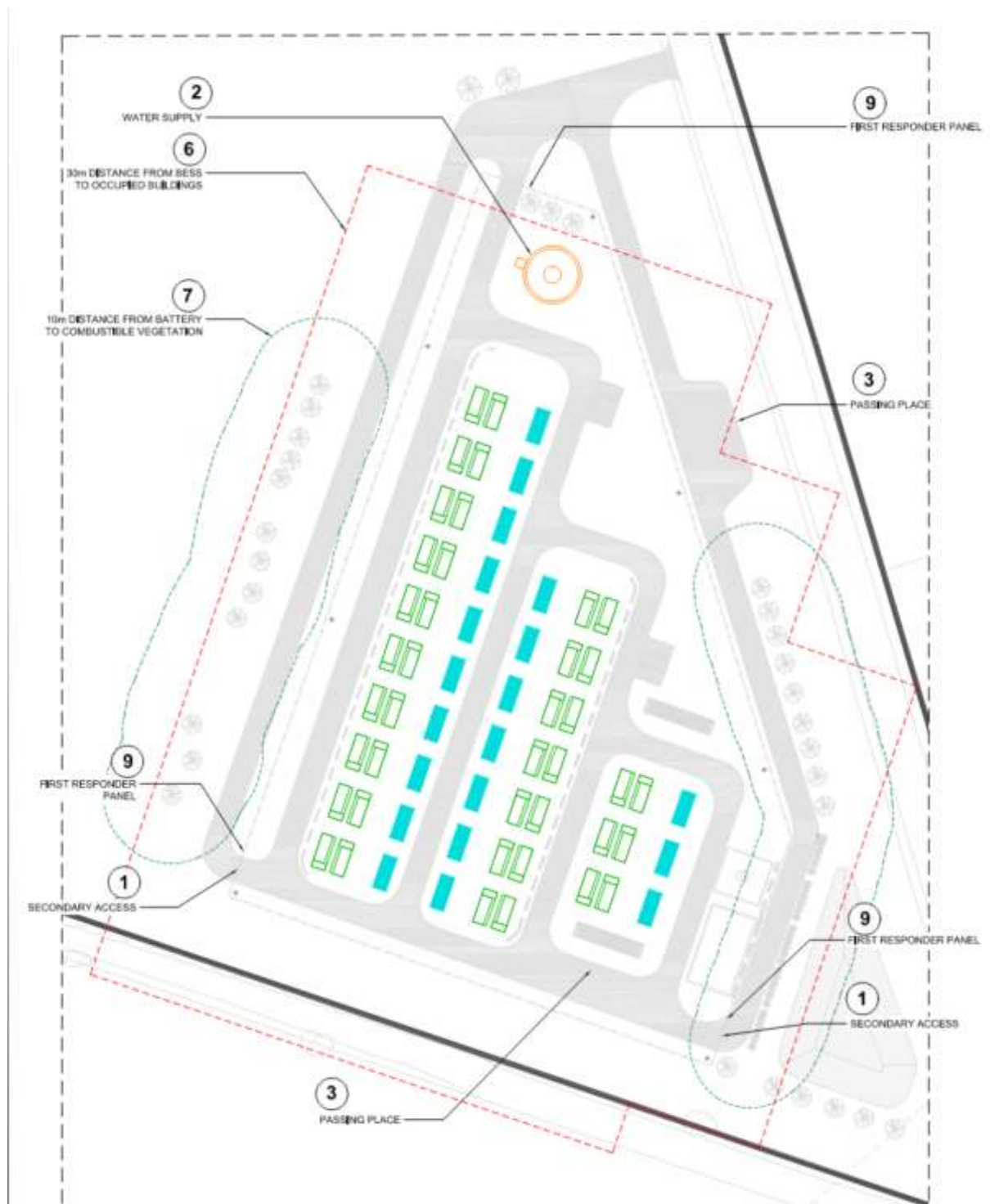


Figure 2 Indicative Layout

1.6 Information Provided by Others

This plan represents only the best judgement of the consultants and manufacturers involved in its preparation and is based on information provided by others. Under no circumstance is liability accepted for the accuracy of this information provided by others.

2. Fire Safety Design Measures

2.1 Overall Fire Safety Strategy

The overall fire safety strategy for the site will be designed to mitigate fire and blast risks associated with the presence of Li-Ion BESS units. The strategy for the site once produced will address thermal runaway hazards, deflagration blasts from flammable gases, and fire spread. Its primary objective is to protect on-site and neighbouring occupants while minimising property damage and disruptions to commercial operations.

A summary of the fire strategy objectives to achieve these risk mitigations is as follows:

- » **Thermal Runaway** – the use of lithium-ion technology certified to relevant standards—such as UL 9540A, UL 1642, UL 1973, and IEC 62619—along with unit-level installation designed in accordance with the latest version of NFPA 855, professional installation, and regular maintenance, will help to minimise the potential causes of thermal runaway, thereby reducing its likelihood. Additionally, the implementation of a well-designed battery management system (BMS) and thermal management system (TMS) further decreases the risk of electrical and thermal damage.
- » **Deflagration Blast** – flammable gas venting to dissipate gases and keep the atmosphere within the containers below the flammable limits. Along with deflagration venting and blast clearance zones to mitigate risks to occupants and damage to site equipment from shrapnel.
- » **Fire Spread** – fire suppression and extinguishment system or fire management system within the units to reduce the fire size along with suitable separation distances to prevent fire propagating to neighbouring units. The fire spread mitigation approach may also adopt a 'burnout' fire strategy, where the fire is contained within a single unit, minimising reliance on fire service intervention and enhancing safety for first responders.

The fire safety design measures required to achieve the fire strategy for the site are categorized into three groups, as outlined below and detailed in the following sections of this report:

- » Preventive Measures
- » Monitoring, Detection and Alarm Systems
- » Control Mitigative Measures.

2.2 Preventive Measures

The prevention measures that are incorporated into the design of the BESS units have the objective of limiting the probability of thermal runaway occurring. These measures are detailed in the following sections.

2.2.1 Battery Chemistry and Type Design

The battery cell to have relevant certification such as UL 9540A and IEC 62619 certification at cell level which will lower the risk of thermal runaway across the battery cell.

The battery cells are expected to be arranged in the enclosure units in a cell-module-rack format, this format is also to meet relevant battery safety certification such as UL 9540A and IEC 62619 at cell, module, unit and unit level.

2.2.2 Thermal Management System – Cooling System

To mitigate the occurrence of thermal runaway, it is recommended to employ a thermal management system that will consist of monitoring equipment and a cooling system. Typical cooling system operates in two stages, based on preset thresholds with BMS; these are as follows,

1. First thermal set point - Activation of the cooling system via the BMS across the required cells;
2. Second higher thermal set point - Emergency shutdown and discharge of cell-module-rack and potentially entire unit shutdown.

2.2.3 Maintenance

In line with the technical specifications for the units and other electrical equipment, energy deficiencies will be monitored, and alerts will be issued as needed. Regular maintenance, including scheduled inspections, will be conducted across the site. This will include the replacement of cells, modules, and racks where electrical faults have occurred, helping to reduce the probability of thermal runaway.

2.3 Monitoring, Detection and Alarm Systems

The BESS units will be equipped with a detection and monitoring system. Depending on the final design, this system is expected to monitor the following:

- » battery/energy performance;
- » cell temperature;
- » gas detection;
- » heat and smoke detection.

All systems will be integrated into the BESS unit's battery management system, which will transmit real-time data to the remote 24/7 control centre.

When pre-set thresholds are reached by the monitoring and detection devices, alarms and corresponding safety preventive/control measures are activated. Typically, the site will have the following types of alarms:

- » Individual BESS unit alarm;
- » site wide alarm;
- » remote 24/7 control centre alarm.

The monitoring, detection, and alarm systems are outlined in the following sections of this report.

2.3.1 Battery and Energy Management Systems

To monitor and assess the probability of thermal runaway occurring across the battery cells, the battery manufacturers typically incorporate an energy management system (EMS) and overall battery management system (BMS). The energy management system on site is recommended to include the following features:

- » 24/7 monitoring of battery cells output and efficiency to determine where there is electrical overload and mechanisms to reduce electrical overload. This includes monitoring of battery state of charge (SOC) and provision to quickly discharge at module, rack and full unit levels.
- » In the event of electrical faults, abuse, or overloading, a multi-step response may be implemented as follows:
 - » Issuance of a warning.
 - » Activation of software controls to stop charging and redistribute the electrical load.
 - » Physical disconnection of the battery at the rack level.

- » Additionally, batteries that do not meet the specified threshold levels or the UL 9540A certification standard will undergo maintenance or replacement.

2.3.2 Thermal Management System – Cell temperature

Each unit will be equipped with an independent thermal management system, consisting of a cooling system and a cell temperature monitoring system as a minimum.

2.3.3 Detection systems

Depending on the equipment supplier, if thermal runaway occurs within the battery storage unit, some or all types of detection systems may be in place to identify risks and activate mitigation measures to prevent its propagation;

- » Flammable gas sensor system;
- » Heat and smoke detection system.
- » Temperature monitoring system.

It is recommended that, as part of the thermal and energy management system's response, the affected cell(s), neighbouring modules, and in some cases, the entire rack where thermal runaway is detected will be discharged, and the entire BESS unit will be shut down to help mitigate further propagation.

The detection and monitoring system should be implemented in accordance with the requirements of NFPA 855 and NFPA 68.

2.3.4 Alarm Systems

Upon activation of either the gas, fire detection or battery management systems, the alarm system for the site will be triggered. There would typically be three types of alarm

- » Visual and Audible alarm from the BESS unit, to alert occupants near the unit to evacuate and highlight what unit is hazardous;
- » Site wide alarm and, to alert occupants across the entire site to evacuate;
- » A 24/7 remote monitoring centre will provide alarms to alert management of battery faults, flammable gas release, or fire within the BESS unit. In response, either:
 - » An evacuation procedure will be initiated, with the control centre coordinating with the fire service and executing the emergency response plan, or
 - » Corrective actions will be taken to address detected electrical faults or energy deficiencies.

It is recommended that additional emergency fire manual call points and alarm activators be installed across the site for each BESS unit, allowing occupants to manually activate the alarm and initiate a unit shutdown.

If a suppression system is provided, manual control panels may be available on-site. Depending on the design of the BESS units, the panels may be installed on each unit or positioned elsewhere on-site, remotely from the BESS units. These panels can manually trigger fire suppression responses, initiate an emergency shutdown of the units, and display the status of the energy system, fire conditions, and suppressant activation.

2.4 Control Measures

The following sections outline the fire and blast safety measures designed for worst-case scenarios in which preventive thermal runaway measures have failed.

Active control measures (suppression/extinguishment systems, fire service intervention, evacuation, etc.) rely on activation by gas, fire detection or battery management systems, whereas passive control measures—such as deflagration venting, clearance zones, and separation distances—operate without requiring activation.

2.4.1 Occupant Safety – Evacuation

To mitigate the risk to occupants from both fire and deflagration blasts, the site will implement a simultaneous evacuation strategy. Upon activation of the alarm—triggered by either the gas, fire, thermal or electrical fault detection systems—audible and visual alarms will be activated across the site to prompt evacuation.

The site is expected to be occupied only during maintenance and routine inspections. Maintenance personnel will be fully trained and provided with risk assessment method statements (RAMS) and high-voltage (HV) training, ensuring they are fully aware of the hazards associated with BESS.

Additionally, it is recommended that BESS units are accessed externally, eliminating the risk of internal entrapment in the event of a fire.

The designated assembly point for evacuation is recommended to be outside the BESS compound and beyond the blast clearance zone from the BESS units. The blast clearance zone to be determined from relevant standards such as the latest version of NFPA 855 or blast modelling undertaken by a competent professional.

Appropriate signage will be installed to direct staff and visitors outside the blast clearance zone during an emergency. Additionally, all staff and visitors will receive an induction on site evacuation procedures before entering.

The signage will be installed in accordance with the draft NFCC Guidance 2024, ensuring that at least one sign is legible at night from a distance of 30 metres or from the site boundary, whichever is closer.

2.4.2 Explosive Blast Provisions

To mitigate the deflagration risks from the BESS units on site, the design will include both a blast clearance zone (minimum of 23 m, however NFPA 855:2023, recommends increasing the blast clearance zone to 30.5 m) and a deflagration ventilation system at the unit level.

2.4.2.1 Blast Clearance Zone

A clearance zone will be integrated into the site design to ensure that neighbouring site hazards and on-site hazards, such as the substation, are located outside this zone. The fire service will be consulted regarding the appropriate boundaries of the clearance zone. Additionally, both the fire service operational point and the occupant assembly point will be positioned outside the clearance zone.

2.4.2.2 Ventilation Systems and Blast Vent

Flammable Gas Exhaust

The BESS units may be equipped with a mechanical gas exhaust system linked to the gas detection system, which helps reduce the buildup of flammable gas within the containers. The system *typically* includes an inlet louvre and an exhaust fan on each side of the enclosure. These fans typically remain idle and are only activated when the gas detector detects the Lower Flammable Limit (LFL). The ventilation system will automatically deactivate when the concentration of flammable gas drops below the LFL.

In the event of a fire within the enclosure, the exhaust system stops, and the vents close as the fire suppression response is activated.

Deflagration Venting

The deflagration venting will be designed in accordance with NFPA 855 and NFPA 68. This design allows the pressure from the deflagration blast to be absorbed by the vent blasting open, preventing damage to the container and reducing the risk of shrapnel dispersing across the site.

2.4.3 Gas Suppression/Extinguishment Systems

To mitigate the risks associated with a BESS fire, including threats to occupants and potential property damage from fire spread, the BESS units may be equipped with a suppression/extinguishment system. Upon activation of heat and smoke detectors, the system typically initiates a time delay to allow for the closure of exhaust vents before releasing the extinguishment agent into the enclosure to extinguish the fire.

The extinguishment agent is typically a gas, aerosol or water. The agent can be stored within individual BESS units or in a storage tank on site.

2.4.4 Separation Distances

To mitigate the risk of fire spread and contain the fire to one unit or to allow for burnout to be achieved, appropriate separation distances will be incorporated into the design. The prescriptive requirements provided in NFPA 855: 2023 - Standard for the Installation of Stationary Energy Storage Systems are tabulated in Table 2 below. Additionally, calculative fire spread analysis will be conducted to fully assess the fire hazards in respect to fire spread.

Where the recommended separation distances outlined in NFPA 855 or NFCC guidance cannot be achieved due to site or other constraints, test evidence from relevant standard tests, such as UL 9540A, and/or peer-reviewed research will be evaluated as a risk mitigation measure. If the fire hazard assessment confirms that shorter separation distances than those specified in Table 2 can effectively mitigate fire spread, they may be implemented instead.

The resulting separation distances will inform the development of a Fire Strategy Plan. An example of a Fire Strategy Plan for the site, prepared by Cadmando, is provided in Appendix A.

Table 2: NFPA 855:2023 Separation Distances for Outdoor ESS

Separation Location and Provisions -	Minimum Separation Distance (mm)
To other BESS Units	6000 ¹
To Egress Routes	3048
To Electrical Equipment, Buildings, Public ways, Lot lines, Stored combustible materials, Hazardous materials, and High-piled stock.	3048
Battery Enclosure with Fire Barrier Protection	914
Notes:	
1. As per Section G.9.2 NFPA 855, separation distance of 6m between enclosures with non-combustible walls.	

2.4.5 Fire Service Intervention and Access

The Rossendale BESS site is expected to have a single direct access point from Bamford Road with good perimeter access that allows to approach the BESS units from more than one direction. Please refer to the illustrative layout in the Fire Strategy Plan (Appendix A) for a visual representation of the multidirectional access to BESS units for the fire service and maintenance purposes. Fire vehicle tracking for the site has been conducted to ensure that sufficient access in terms of width, hardstanding's and turning provisions.

The final fire safety design will be reviewed in consultation with the fire service to ensure minimal reliance on their intervention. Adequate separation distances will be established to mitigate the risk of fire spread to other BESS units, electrical equipment, or neighbouring site hazards.

In the event of a fire detected within the units, the fire service will be called out by the 24/7 control centre or site operatives. The control centre will be able to support the fire service with providing the location of fire and blast hazards on the site. It is also recommended that a trained responsible site operative personnel, aware of site hazards and procedures, is also called out to the site in the event of an emergency to help coordinate with the fire service on site.

In accordance with NFCC guidance, the site will be equipped with an appropriate water supply. Additionally, measures such as an attenuation pond with a restricted outflow will be implemented to manage water runoff from fire service hose streams, helping to mitigate environmental impact.

In line with the 2024 draft NFCC guidance, an Emergency Response Plan will be developed and shared with the local Fire and Rescue Service (FRS) point of contact.

3. Operation and Cause & Effect of the Fire Safety Measures

3.1 Battery and Energy Management System (plus cooling system)

Figure 3 below provides a summary of the typical cause-and-effect relationship with respect to the battery and energy management systems, highlighting measures to reduce the probability of thermal runaway.

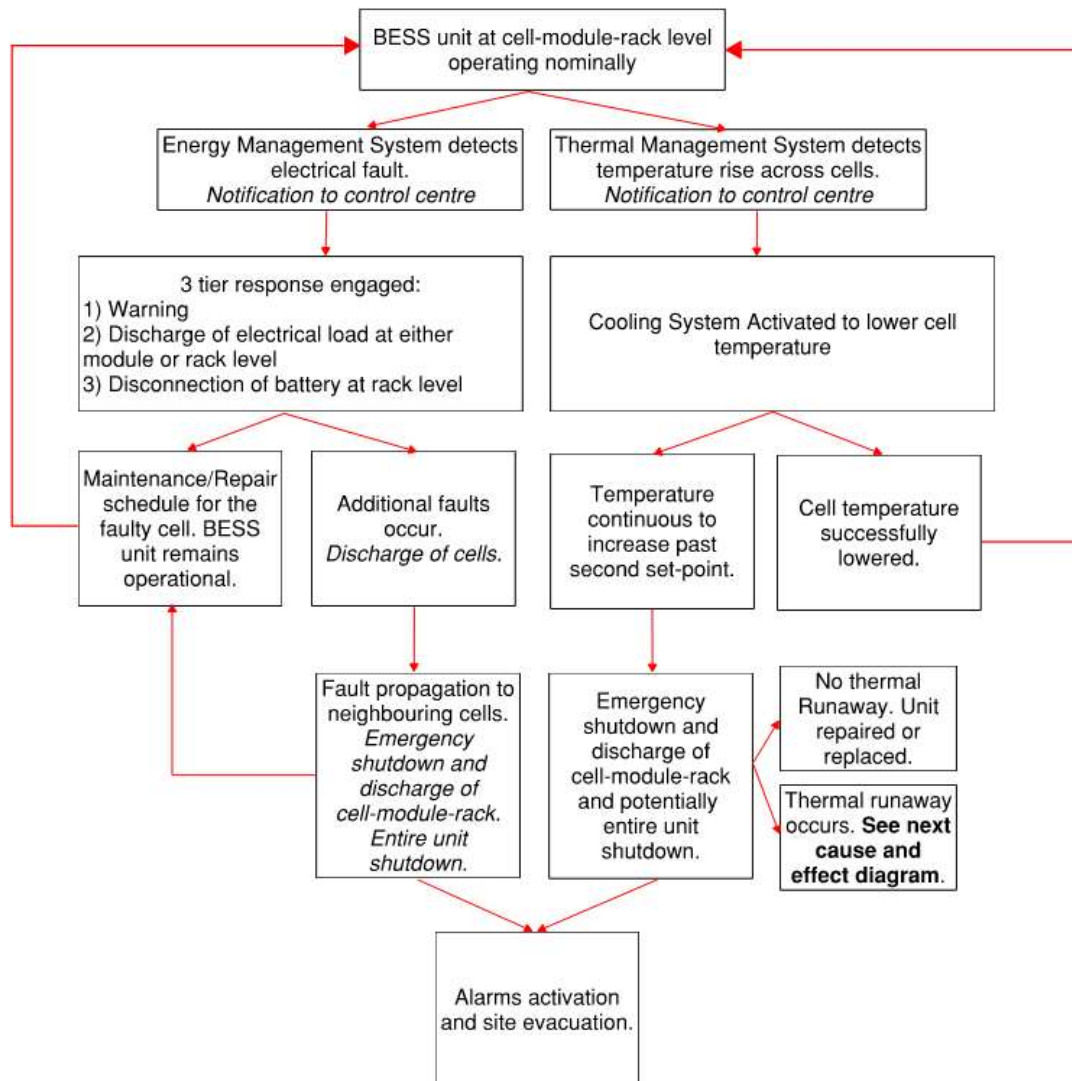


Figure 3 BMS Cause and Effect

3.2 Deflagration Blast Protection Process

Figure 4 below summarises the typical cause & effect in relation to the flammable gas protection systems, with respect to reducing the risks of a deflagration blast.

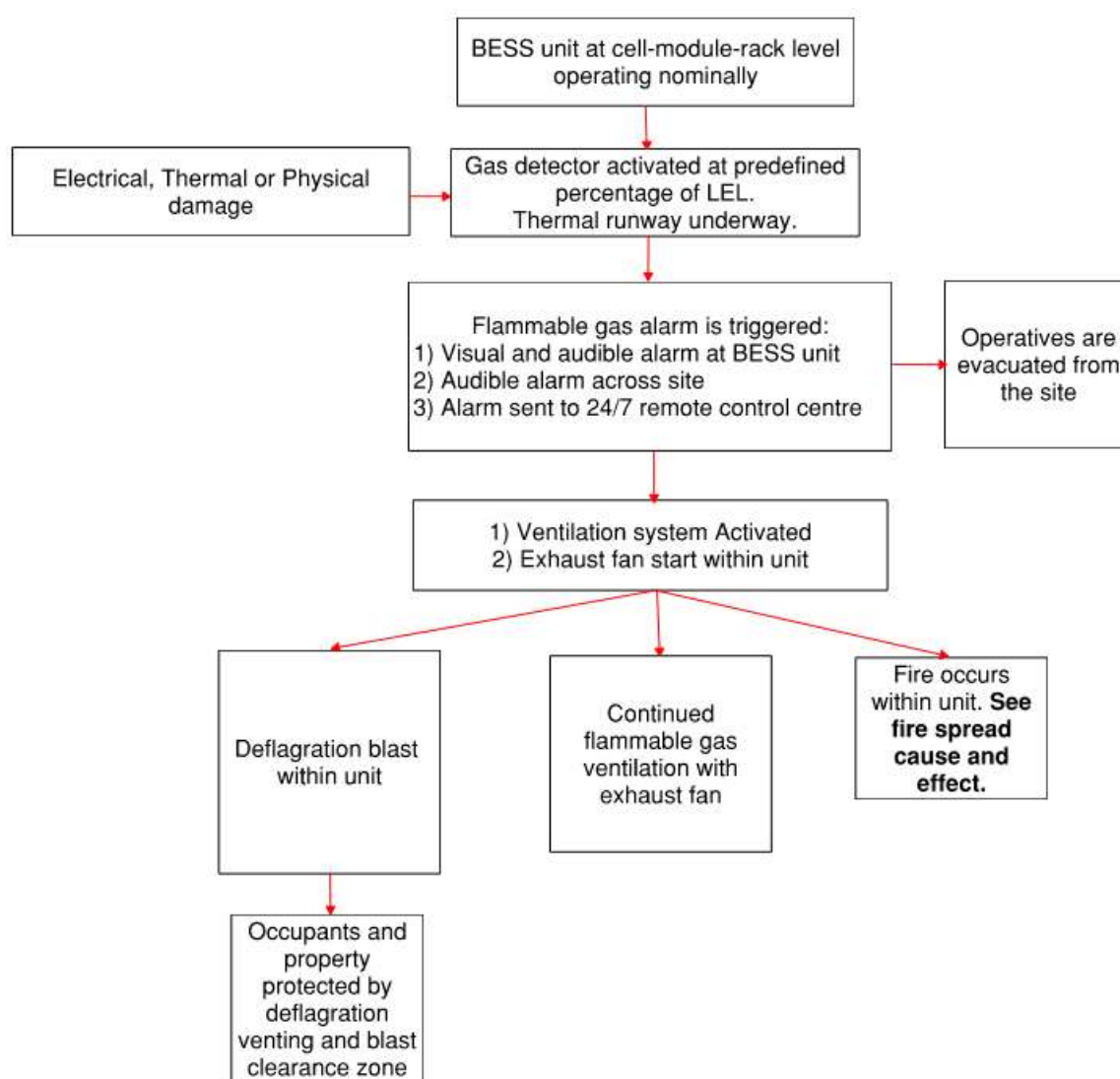


Figure 4 Flammable Gas and Deflagration Blast Risk Cause and Effect

3.3 Fire Alarm and Spread Process

Figure 5 below provides a summary of the typical cause-and-effect relationships between the fire alarm and suppression systems in mitigating the risk of fire spread at a BESS site.

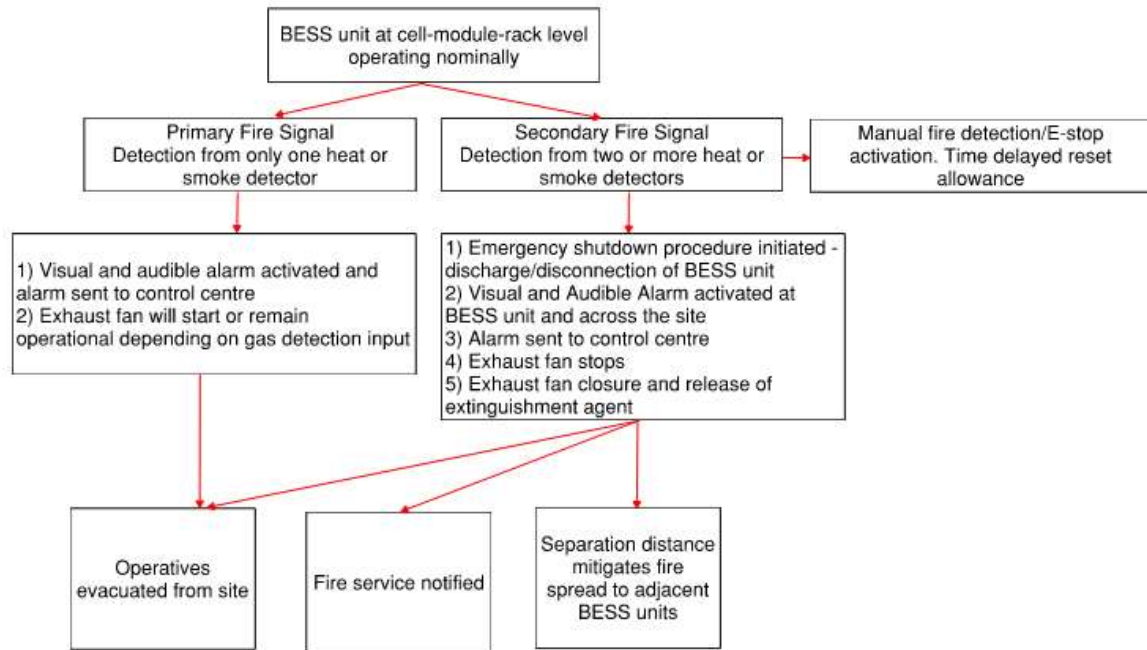


Figure 5 Fire Alarm and Spread Risk Cause and Effect

4. Summary

With the implementation of detailed preventive measures, monitoring, detection and alarm systems, and control measures, it is anticipated that the fire strategy objectives outlined below can be effectively achieved for this site:

- » **Thermal Runaway** – the use of lithium-ion technology certified to relevant standards—such as UL 9540A, UL 1642, UL 1973, and IEC 62619—along with unit-level installation designed in accordance with the latest version of NFPA 855, professional installation, and regular maintenance, will help to minimise the potential causes of thermal runaway, thereby reducing its likelihood. Additionally, the implementation of a well-designed battery management system (BMS) and thermal management system (TMS) further decreases the risk of electrical and thermal damage.
- » **Deflagration Blast** – flammable gas venting to dissipate gases and keep the atmosphere within the containers below the flammable limits. Along with deflagration venting and blast clearance zones to mitigate risks to occupants and damage to site equipment from shrapnel.
- » **Fire Spread** – fire extinguishment system or fire management system within the units to reduce the fire size along with suitable separation distances to prevent fire propagating to neighbouring units. The fire spread mitigation approach can also adopt a 'burnout' fire strategy, where the fire is contained within a single unit, minimising reliance on fire service intervention and enhancing safety for first responders.

This fire safety design plan can serve as the foundation for developing the overall site and battery management plan, and it will also contribute to the formulation of the site's emergency response plan.

Appendix A

Indicative Fire Strategy Plan

Battery Energy Storage Site Design Guidance for FRS Checklist			
Ref Number	Guidance Description for Battery Energy Storage Design	Guidance Achieved	Notes
N/A	Confirmation that the Battery Storage System will comply to UL 9540A	Yes	Further documentation will be provided from the eventual supplier of the BESS, with up-to-date information on compliance with fire testing and control systems. The proposed development is intended to use a supplier / manufacturer is compliant with this code.
1	Secondary access / exit point for emergency vehicles has been provided giving consideration to prevailing wind conditions	Yes	2 x alternative access points provided, taking into account prevailing wind conditions
2	Provision of adequate water supply and firefighting infrastructure to allow safe and effective emergency response.	Yes	A 240,000l Water Tank has been provided at the entrance to the site. Water Tanks to be no closer than 10m from BESS.
3	Passing places to be provided on access route suitable for fire service vehicles	Yes	Passing places have been provided along all access routes.
4	Consideration to minimum spacing requirements between Battery Storage	Yes	Draft NFCC Guidance for Battery Energy Storage references to NFPA 855 (minimum spacing of 0.914m between adjacent BESS units). Adequate spacing for maintenance must be accounted for between BESS clusters with a spacing of 0.914m between BESS units within the Cluster. Chosen technology to comply with UL 9540A (or approved similar test) to demonstrate that a thermal event can be contained to the BESS of origin and ensure that propagation does not occur.
5	30m distance from BESS to Site Boundary achieved	No	The site has been designed with the intent to locate the majority of the BESS 30m from the Site Boundary, due to the existing constraints; a number of BESS units fall within 30m. Considering the proposed layout and the sites rural location we judge this to be a manageable risk.
6	30m distance from BESS to Occupied Buildings achieved	Yes	There are no BESS units within 30m of Occupied Buildings
7	Battery Storage not to be placed within 10m of any combustible vegetation.	Yes	There is no combustible vegetation within 10m of the BESS units.
8	Internal access must be suitable for the Fire Rescue Emergency vehicles.	Yes	Swept path analysis ensures the emergency vehicles have full access of the site; the following points (amongst others) have been considered during the design: 3.7m (min.) track width (design 4.5m), Pump Truck turning circle (design provides multiple circular loops, no dead ends and therefore no turning circle required), min. width (3.1m) of gateways (designed gates 6m), no dead ends exceeding 20m.
9	Provision of an annunciation panel to provide FRS with live, accurate information on safety systems and status of battery units	Yes	First Responder panels (referred to as Annunciation Panels in NFCC guidance) positioned at primary and emergency site entrances for each section of the site to ensure that they are accessible by FRS in event of a fire incident.

ROSSENDALE BESS SITE HAS BEEN DESIGNED IN CLOSE ACCORDANCE WITH THE RECOMMENDATIONS SET OUT BY THE FIRE CHIEF COUNCIL AND IN PARTICULAR WITH REFERENCE TO THE DOCUMENT 'GRID SCALE BATTERY ENERGY STORAGE SYSTEM PLANNING – GUIDANCE FOR FRS' THE PURPOSE OF THIS PLAN IS TO DEMONSTRATE THE CONSIDERATIONS AND COMPLIANCE OF THE DESIGN WITH THIS GUIDANCE.

THIS PLAN TO BE READ IN CONJUNCTION WITH THE PROPOSED SITE LAYOUT PLAN REF: CUB001-PL-03

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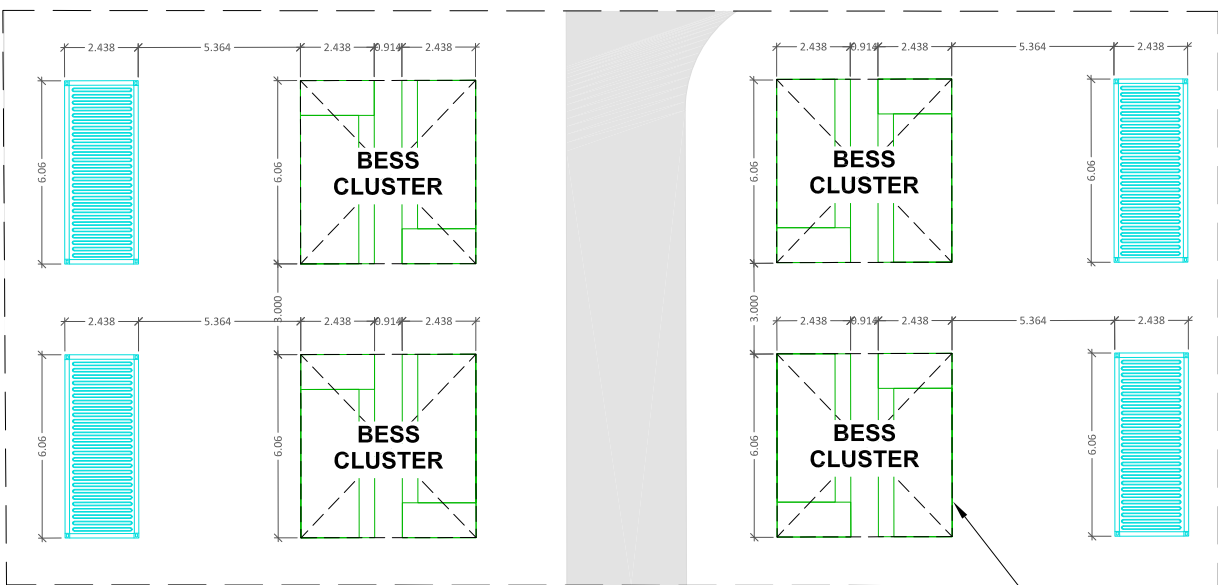
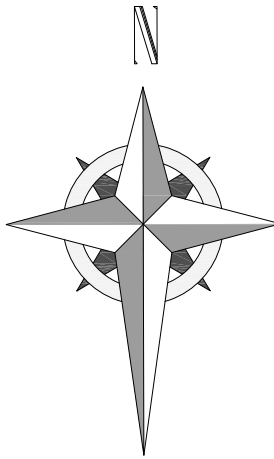
Scaled dimensions must not be taken from this drawing. All dimensions are to be confirmed on site prior to commencement of work.

Revisions:				
Revision	Date	Revision Notes	Drawn	Inspected
01	06.03.25	First Issue	OM	PR

LEGEND:

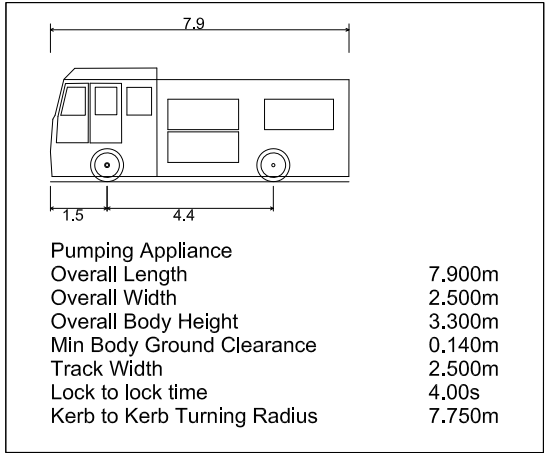
--- 30M OFFSET FROM SITE BOUNDARY ---

--- 10M OFFSET FROM VEGETATION ---

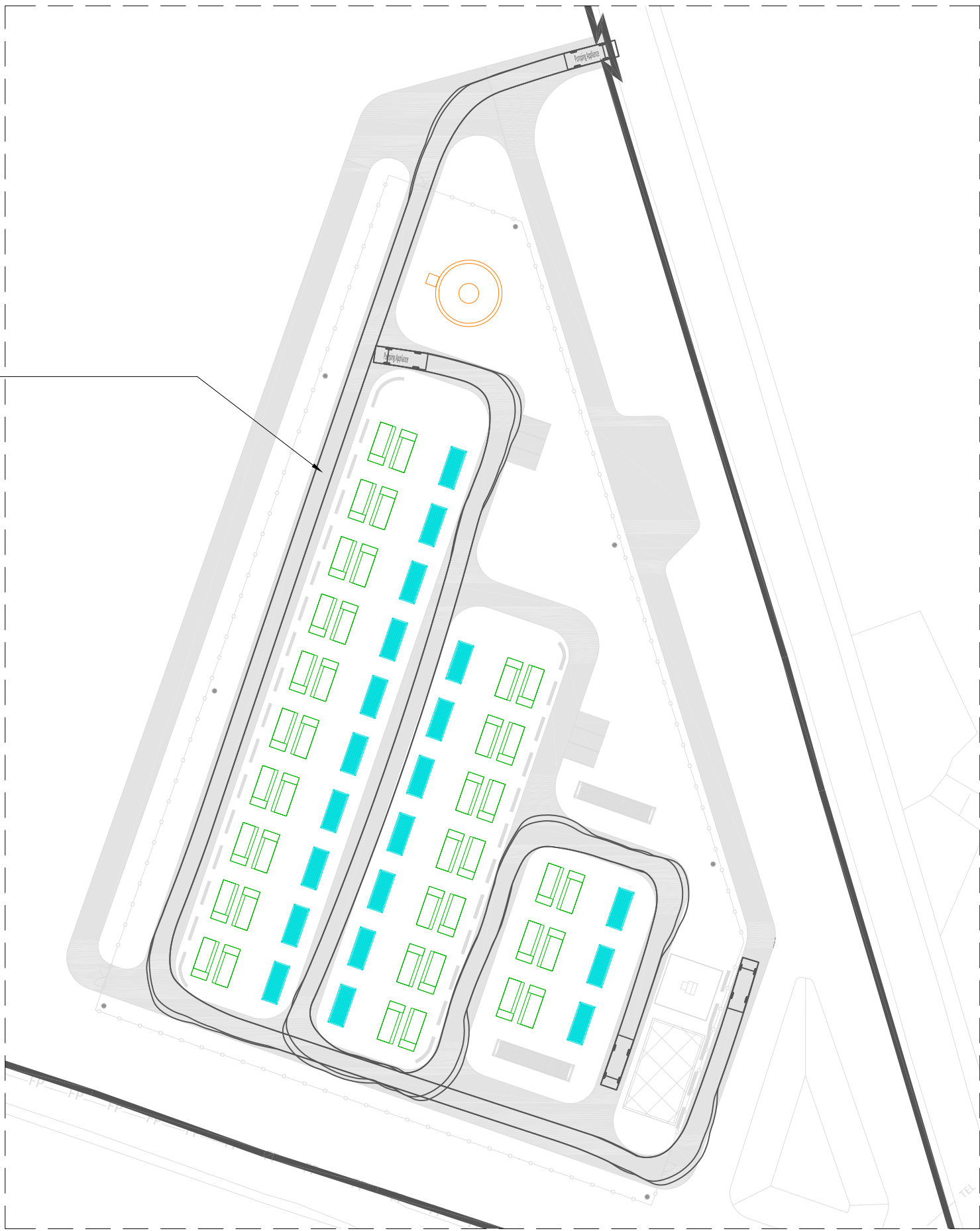


Enlarged view: Battery Storage Spacing

Scale: NTS

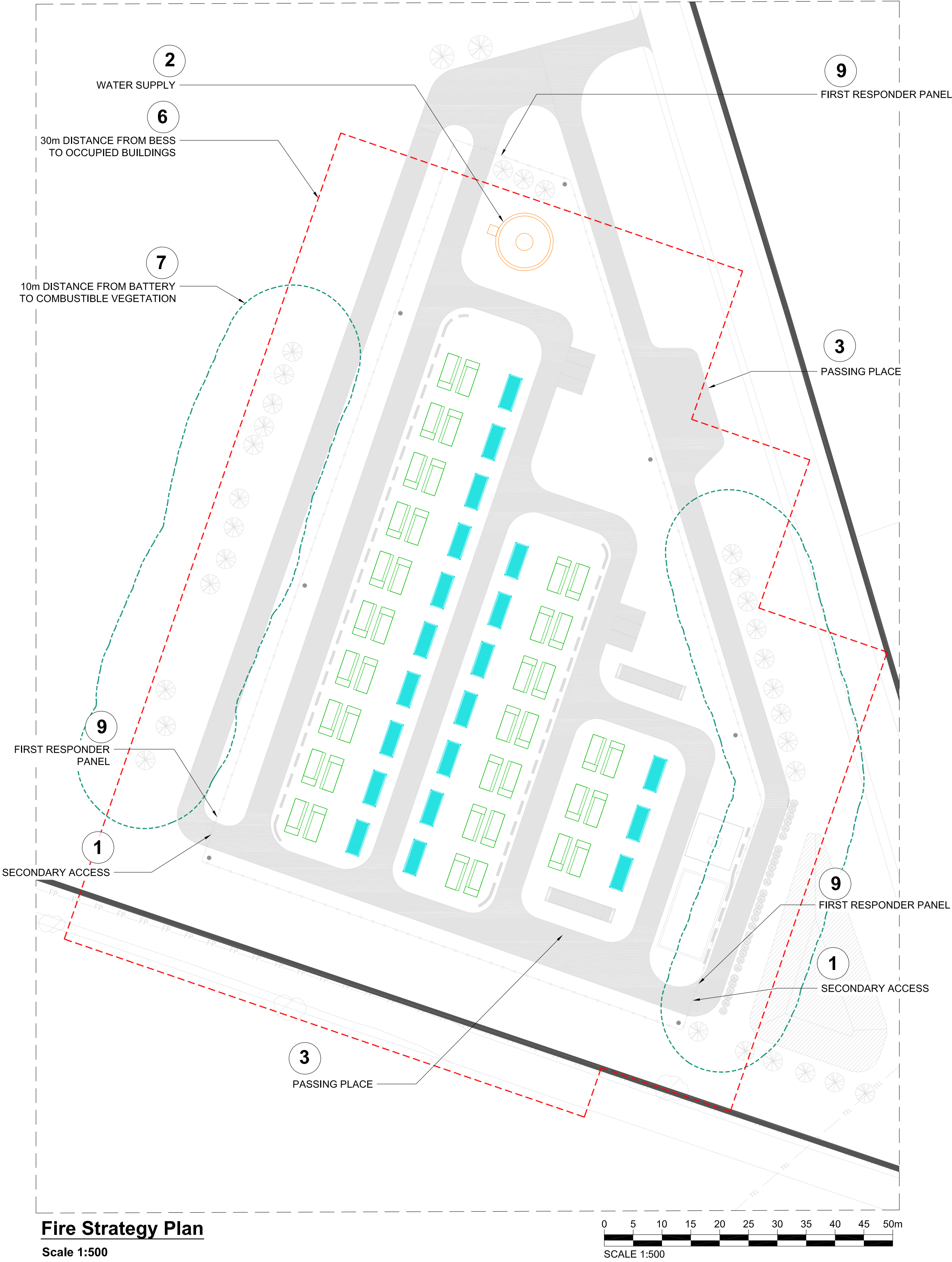


ACCESS AND TRACKS DESIGNED FOR FIRE RESCUE SERVICE. SWEEP PATH ANALYSIS CONDUCTED USING THE FOLLOWING VEHICLE SPEC:



Enlarged view: Swept Path analysis for Emergency access

Scale: NTS



Fire Strategy Plan

Scale 1:500

Status: **PLANNING**

Project: **Rossendale BESS**
Rochdale Road, Turn Village

Client:

Cubico
SUSTAINABLE INVESTMENTS

Cubico Sustainable Investments
Tel: 020 3805 3900
www.cubicoinvest.com

Drawn by:

CADmando
2D, 3D CAD & BIM SERVICES

CADmando Design & Drafting Solutions Ltd
Unit B2, The Courtyard, Severn Drive, Tewkesbury Business Park, GL20 8GD
Tel: +44 (0) 1684 850019
Mob: +44 (0) 7814336910

Drawing Title:
Rossendale BESS - Indicative Fire Strategy Plan

Drawn: OM	Checked: PR	First Issued: 06.03.2025
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Project Code: Drawing Number:
CUB001- FS-01

Sheet Size: A1	Scale: A.N	Revision: 01
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