

Mr Oliver Phippen
Wiltshire Council
Development Control North
Monkton Park Offices Monkton Park
Chippenham
Wiltshire
SN15 1ER

Our ref: WX/2025/139168/01-L01
Your ref: PL/2025/05830

Date: 21 August 2025

Dear Mr Phippen

THE CONSTRUCTION AND OPERATION (INCLUDING MAINTENANCE) OF A 49.9MW SOLAR FARM TO INCLUDE GROUND MOUNTED SOLAR PHOTOVOLTAIC (PV) ARRAYS, ELECTRICAL SUBSTATIONS, GRID BALANCING INFRASTRUCTURE, CABLING, BESS (49.9MW CAPACITY), COMMUNICATIONS TOWER, OTHER ASSOCIATED INFRASTRUCTURE AND AREAS FOR BIODIVERSITY NET GAIN (BNG) ENHANCEMENT AND LANDSCAPE MITIGATION

FLAXLANDS FARM, ROYAL WOOTTON BASSETT, SWINDON

Thank you for consulting the Environment Agency on the above application.

Environment Agency Position

We **object** to the planning application, as submitted, because the proposed development would pose an unacceptable risk of pollution of groundwater. We recommend that planning permission should be refused on this basis, in line with paragraph 174 of the NPPF.

Reason

Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 2/ 2c and is located upon Secondary A Aquifer.

In this case there is potential for pollution of the water environment due to abnormal and emergency situations at Battery Energy Storage System (BESS) developments, in particular fires. This would be exacerbated in a vulnerable groundwater location. There is a risk that highly polluting chemicals in batteries could enter groundwater in firewater or rainfall. Applicants should assess risks to groundwater and ensure mitigation is in place for containment of this water.

While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, rainwater could enter exposed containers through the period of time it takes to remove or cover burnt out containers.

Overcoming our objection

The applicant should provide intrusive ground investigation to develop the conceptual site model according to the 'Land contamination and risk management (LCRM)' guidance. This is to confirm the ground and groundwater conditions on the site, assess anticipated risk and suggest mitigation measures.

Note to applicant/ LPA – Biodiversity

A 10-metre buffer must be maintained around all watercourses and ponds, with no work or crossings allowed in these areas. This will help protect riparian mammals and aquatic ecosystems. Great crested newts have been found on site, therefore, so Natural England should be consulted to obtain a District Level Licence, ensuring minimal disturbance to the species during works.

Note to LPA

If you are minded to approve this application contrary to our flood risk objection, we request that you contact us to allow further representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2021.

In accordance with the planning practice guidance, please notify us by email of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me.

Yours sincerely

Mr Harry Hembery
Sustainable Places - Planning Advisor

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