

Gen Collins
Wiltshire Council
Development Control- North
Monkton Park Offices
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Our ref: WX/2025/139349/01-L01
Your ref: PL/2025/07349

Date: 31 October 2025

Dear Gen

VARIATION OF CONDITION 3 (LAYOUT CHANGES), CONDITION 14 (CHANGES TO NOISE CONDITION) AND CONDITIONS 4, 5 AND 7 (MINOR WORDING CHANGES) RELATING TO APPLICATION PL/2021/08690

STUDLEY FARM BATH ROAD, ATWORTH, MELKSHAM, SN12 8JN.

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

Since we commented on the original planning application (PL/2021/08690) our national position on Battery Energy Storage Systems (BESS) has been updated. We therefore have provided our response in line with our current position.

Environment Agency Position

We **object** to this application as submitted because the proposed development would pose an unacceptable risk of pollution to controlled water and recommend that planning permission should be refused on this basis.

Reason(s)

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 when in close proximity to surface waterbody (Bradford Brook). There is a risk that highly polluting chemicals in batteries could enter surface water in firewater or rainfall. Applicants should assess risks to water quality and ensure mitigation is in place to ensure 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, water could enter exposed containers through rainfall during the period of time it takes to remove or cover burnt out containers.

Overcoming our objection

To overcome our objection documents/plans must be submitted which shows that the site has sealed drainage via an engineered soakaway which, in case of a fire, can be diverted to a storage lagoon or tank with sufficient capacity for both the firefighting runoff and maximum potential rainwater.

The system for diverting the discharge from the soakaway to the lagoon / tank should be automatic with a backup system in place in case of power failure.

Sealed drainage will also limit the amount of potential contamination (and later remediation) of the soil and gravel by firefighting runoff. The sealed drainage should be via an impermeable membrane which drains to an engineered soakaway during normal operation. The impermeable

Environment Agency, Rivers House (Sunrise Business Park) Higher Shaftesbury Road, Blandford Forum, Dorset, DT11 8ST. Customer services line: 03708 506 506 www.gov.uk/environment-agency

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membrane(s) in the main site and the lagoon must be capable of resisting the corrosive chemicals in any firefighting runoff and the heat generated by a fire.

There must be contingencies in place to ensure no firefighting runoff enters either the surrounding local or on-site sewage system (if the site is to be connected to mains sewerage).

The developer should engage with Wessex Water & the Fire Rescue Service to make sure there is an adequate supply of water for the maximum expected duration of a fire.

The site should have plans in place for testing and removal / disposal of any contaminated soil / gravel / post incident, and the lagoon / tank & associated pipework must be cleaned to ensure no residual contamination is released into the environment when normal operation resumes.

Please re-consult us when further information has been submitted to overcome the above.

Advice to LPA/Applicant

In line with [planning practice guidance](#):

- Applicants are encouraged to engage with Local Fire & Rescue Services to ensure issues of siting and location of BESS are dealt with before applications are made. Ideally this should be done before submitting a planning application.
- Local planning authorities are encouraged to engage with Local Fire & Rescue Services and to refer to [guidance produced by the National Fire Chiefs Council](#) for consideration when determining applications.
- Applicants will also need to comply with relevant Building Regulations in [Part B](#). They require applicants to provide suitable access for the fire service.

Applicants should also refer to guidance published by The Department for Energy Security and Net Zero: [Health and safety in grid scale electrical energy storage systems](#), which provides guidance on a number of topics related to health and safety including on 'Design and planning' that provides guidance on battery technology, site selection, site layout and emergency planning. It also includes a section on 'Decommissioning and end of life', including dealing with batteries that have come to the end of their use in the BESS.

Note to LPA

If you are minded to approve the application contrary to our objection, we request you contact us prior to a decision being made to allow us to make further representations.

If you have any queries regarding our response, please get in touch

Yours sincerely

Ms Lindsay Ffello
Sustainable Places - Planning Advisor

Email wx.sp@environment-agency.gov.uk
Phone 020 3025 1229