



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.

EA Objection

CAWS welcomes the EA Objection dated 31 October 2025 and supports the recommendations made, particularly with regard to consultation with Wessex Water and the FRS. We submit the information below to support that dialogue.

Additional comments are also provided with regard to cales routes and traffic mitigation measures.

NFCC Guidance

To the best of our knowledge and belief the extant NFCC Guidance is Version 1.0 November 2022 and that the version you referred to at the 27 November 2025 event has no standing at this time as it has been subject to consultation and an updated document has not yet been formally released. CAWS therefore strongly encourages the developer to base its proposals on the extant version.

Battery Container Spacing

The extant NFCC Guidance states a minimum spacing of 6 meters. Contrary to your statement, spacing is not dependant on battery chemistry at this point in time.

The guidance allows a reduction in spacing if designed by a competent fire engineer and CAWS would expect any design to be ratified by DWFRS.

Extract from the extant NFCC Guidance below.

Access between BESS units and unit spacing

In the event of a fire involving a BESS unit, one of the primary tactics employed will be to prevent further unit to unit fire spread. Suitable access for firefighters to operate unimpeded between units will therefore be required. This should allow for the laying and movement of hose lines and, as such, access should be free of restrictions and obstacles. The presence of High Voltage DC Electrical Systems is a risk and their location should be identified. Exclusion zones should be identified.

A standard minimum spacing between units of 6 metres is suggested⁹ unless suitable design features can be introduced to reduce that spacing. If reducing distances a clear, evidence based, case for the reduction should be shown.

Any reduction in this separation distance should be design based by a competent fire engineer. There should be consideration for the fire separation internally and the total realistic load of fire. Proposed distances should be based on radiant heat flux (output) as an ignition source.

The NFCC does not support the stacking of containers/units on top of one another on the basis of the level of risk in relation to fire loading, potential fire spread, and restrictions on access.

Firewater and Firewater Runoff

In designing your firewater delivery and runoff solution please note that the NFCC guidance of 1900 litres a minute for 2 hours is a minimum and for schemes of 1MW upwards. CAWS would expect appropriate scaling of the firewater and firewater runoff requirements to reflect the size of the proposed BESS and its location.

There is no evidence that boundary cooling requires less water than directly cooling a burning fire.

There is also no evidence that the volume of water needed to deal with an incident can be varied by reference to battery chemistry.

We recommend you discuss your solution with DWFRS.

Extract from the extant NFCC Guidance below.

Water Supplies

Water supplies will depend on the size of the installation. In the majority of cases, initial firefighting intervention will focus on defensive firefighting measures to prevent fire spread to adjacent containers. As a result, proposals for water supplies on site should be developed following liaison with the local fire and rescue service taking into account the likely flow rates required to achieve tactical priorities. This should also take account of the ability of/anticipated time for the fire and rescue service to bring larger volumes of water to site (for example through the provision of High Volume Pumps).

IP ratings of units should be known so that risks associated with boundary cooling can be understood.

As a minimum, it is recommended that hydrant supplies for boundary cooling purposes should be located close to BESS containers (but considering safe access in the event of a fire) and should be capable of delivering no less than 1,900 litres per minute for at least 2 hours. Fire and rescue services may wish to increase this requirement dependant on location and their ability to bring supplementary supplies to site in a timely fashion.

Water supply for any automatic suppression system will be covered by the relevant standard/design depending on which system chosen as appropriate for the risk. For manual water, amounts should come from performance based requirement rather than a reference to a code, unless it can be proven that the code specifically covers BESS. Regarding water storage tanks, volumes will again need to be informed on a performance-based need. Isolation points should be identified.

Any static water storage tanks designed to be used for firefighting must be located at least 10 metres away from any BESS container/cabinet. They must be clearly marked with appropriate signage. They must be easily accessible to FRS vehicles and their siting should be considered as part of a risk assessed approach that considers potential fire development/impacts. Outlets and connections should be agreed with the local FRS. Any outlets and hard suction points should be protected from mechanical damage (e.g. through use of bollards).

Consideration should be given, within the site design, to the management of water run-off (e.g. drainage systems, interceptors, bunded lagoons etc).

Toxic Cloud

The developers assertion that a toxic cloud from a fire or explosion does not present a risk is misguided and very worrying. There have been many BESS incidents around the world requiring public evacuation to reduce the risk of damage to health.

CAWS recommends that the developer conducts a plume analysis to take account of prevailing winds, topography and the location of residential properties, business and schools. The solution design, and the location of the BESS, should minimise risks to the public.

Cable Route and Associated Traffic Mitigation

Whilst the collaborative approach to cable trenching etc along Westlands Lane is welcomed, it was clear from the 27 November 2025 event that there is a high risk of concurrent working along Top Lane (with road closures) and Shaw Hill (with traffic control). Taken together with other schemes in the area, traffic diversions and heavy traffic generally, the community is concerned about gridlock.

Please confirm you will work collaboratively with Aureos and Wiltshire Council to deconflict the two cable programmes so that the impact on residents can be minimised.

Construction Traffic Mitigation

The Wicks Farm Solar and BESS, Melksham East and West BESS, and works at Melksham Substation, are generating heavy traffic movements and require traffic monitoring arrangements to stop access from the A350 through Westlands Lane. Action has been necessary to enforce these arrangements.

There is a clear risk that construction traffic for Studely Farm will exacerbate existing traffic issues in the area.

Please confirm you will set out the proposed routes for construction traffic, taking account of existing constraints, for agreement with Wiltshire Council.

28 November 2025