

Georgina Wright
Wiltshire Council
Development Control
County Hall
Bythesea Road
Trowbridge
BA14 8JN

Our reference: PA-0000960/01
Your reference: PL/2026/01867

23 April 2026

Dear Georgina,

Erect building - 6,968 sqm GIA (Use Classes E(g), B2 and B8) - with associated facilities, access with security, parking, hard and soft landscaping, drainage and associated works; A new roundabout from the A345 with footways and bus stops; A new access to Chemring Countermeasures UK including turning and security; Solar Fields; and associated works

LAND ADJACENT TO A345, HIGH POST, SALISBURY

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

Environment Agency Position

We **object** to this application on the following grounds.

Objection 1 – Land contamination

Objection 2 – Risk to groundwater by the Battery Energy Storage

Objection 1 – Land contamination

The application site appears to be largely agricultural land with a mostly perceived low risk in terms of past contaminative uses for the bulk of the application area. However, the application extends into parts of the Chemring Countermeasures site. Of potential concern from a land contamination perspective is the portion labelled 'new access' that extends into Chemring Countermeasures. On recent aerial photography that area appears to be used as materials and/or waste storage. There is therefore a need to understand the risks associated with that area and the application site as a whole.

We **object**, as its planning application does not demonstrate that the risks of pollution from land contamination to controlled waters are acceptable, or can be appropriately managed with a viable and practicable remediation strategy. We therefore recommend that planning permission is refused.

Reason(s)

- The previous use of part the development site for the manufacture of countermeasures presents a risk of contamination that may mobilise during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the site is located:
 - within source protection zones 2&3;
 - within 100 metres of a known boreholes used for the supply of water for human consumption;
 - upon a Principal Aquifer.
- The risk is considered unacceptable because there is no evidence to indicate otherwise.

As the planning application is not supported by an appropriate risk assessment, it does not meet the requirements set out in paragraphs 187 and 196 of the NPPF.

Overcoming objection 1

The applicant should submit a preliminary risk assessment which includes but is not limited to a desk study, site walkover, conceptual model, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for the next steps in accordance with the Environment Agency's [Land Contamination Risk Management \(LCRM\)](#) guidance. This information must demonstrate to the LPA that the risks to controlled waters have been fully understood and can be addressed through appropriate measures.

Objection 2 – Risk to groundwater by the Battery Energy Storage

The application includes Battery Energy Storage Systems housed in six containers. Battery Energy Storage Systems pose a potential risk of contamination in the event of a fire, where polluting and hazardous compounds within the batteries and associated components are released and can enter the environment via leaching.

We **object**, as submitted, because the risks to groundwater from the development are unacceptable. The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused on this basis in line with paragraph 187 of the NPPF.

Reasons

Groundwater is particularly sensitive in this location because the proposed development site:

- within source protection zones 2&3;
- within 100 metres of a known boreholes used for the supply of water for human consumption;
- upon a Principal Aquifer.

We consider that the proposed development poses an unacceptable risk of causing a detrimental impact to groundwater quality because 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 during the period of time it takes to remove or cover burnt out containers.

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed. In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater.

Overcoming objection 2

We will maintain our objection until we receive a satisfactory risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed. This would be likely to include measures to prevent the loss of runoff to ground in the event of a fire and the retention of leached contaminants.

The applicant should submit a Preliminary Risk Assessment (PRA) which includes but not limited to a desk study, site walkover, conceptual model, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for assumptions.

This information must demonstrate to the LPA that the risks to groundwater has been fully understood and can be addressed through appropriate measures.

Note to LPA/Applicant – Construction Environmental Management Plan(CEMP)

The applicant has submitted a Draft Construction Management Plan (CMP) (written by Atlas Planning Group, dated March 2026) which doesn't appear to include anything with regards managing pollution and protecting water quality.

Given the sensitivity of the site and the proposed discharge to ground. A Construction Environment Management Plan (CEMP) is required to demonstrate appropriate pollution prevention measures during the construction phase.

The CEMP needs to include, but not be limited to, measures to:

- control silt-laden runoff
- manage dewatering where required
- prevent pollution from fuels, oils, and concrete

- protect on-site drainage ditches (rhynes) from contamination
- manage surface water runoff
- set out fuel and chemical storage arrangements
- set out plant refuelling procedures
- manage wheel washing

Without these safeguards we are unclear if the water environment will be fully protected during the construction of the development.

It should be noted that we would normally condition a CEMP, however as a CMP has been provided, we want to give the applicant the opportunity to cover the missing elements. If this information is not available at this current time, then we would be open to a condition to require this information at a later stage once our objections have been withdrawn.

Advice to Applicant - Control of Major Accidents Hazards Regulations

Chemring Countermeasures Ltd are regulated as a lower tier establishment under the Control of Major Accidents Hazards Regulations 2015 (COMAH). Regulation 5 requires every COMAH operator to prepare a Major Accident Prevention Policy (MAPP). If this planning application is granted Chemring Countermeasures Ltd will need to review and modify their MAPP to incorporate the changes to their site operation such as the new access road and site entrance.

Advice to Applicant – Environmental Permit

The application also proposes the use of a package treatment plant for foul drainage; however, no details have been provided on its proposed location. The site lies within Source Protection Zone 2 (SPZ2). Given the scale of development and the SPZ designation, the proposed discharge will likely not meet the General Binding Rules, and therefore an Environment Agency issued permit to discharge will be required. Applicants should be aware that a permit is not guaranteed and will depend on detailed design, hydrogeological risk assessment, and site-specific constraints.

Advice to LPA/applicant – Battery Energy Storage System (BESS)

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.
- LPAs 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 have any queries regarding our response, please get in touch

Yours sincerely,

Lindsay Grant
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