

Georgina Wright
Wiltshire Council

Reference: PA-0000960/03
LPA reference: PL/2026/01867

24 August 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 reconsulting the Environment Agency on the above application.

Environment Agency position

We note in the Agent letter dated 29th July 2026 that the previously proposed Battery Energy Storage Systems (BESS) has been removed from the proposal. As BESS has been removed from the proposal, we have **no objection** to the amended proposal provided that the **following conditions** are added to any grant of permission.

Land contamination

We have reviewed the following documents;

- 'Preliminary Investigation Report at Land adjacent to A345, High Post, Salisbury, Wiltshire SP4 6AT for Nationwide Engineering Reference: 22483/PIR Rev1.0 July 2026'
- A letter entitled 'Re: Land adjacent to A345, High Post, Salisbury, Wiltshire SP4 6AT – Site Investigation Scheme' dated 27th July 2026

Portions of the proposed development site are located within the boundary of Chemring Countermeasures, which manufactures pyrotechnic products. This presents a medium risk of contamination that could be mobilised during site works

and construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is:

- within source protection zone 2 & 3 for public water supply abstraction;
- within 100 metres of a known borehole used for the supply of water for human consumption;
- located upon a principal aquifer (Chalk);

The applicant's supporting evidence (listed above) demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information is however required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the LPA. This is required prior to commencement of the development.

In light of the above, the proposed development will be acceptable, if planning conditions are included requiring the submission of a detailed land contamination management strategy. This should be carried out by a competent person in line with P2(1-3) of the NPPF.

Without these conditions we would object to the proposed development in line with P2(1-2) and P3(1-2) of the NPPF because it cannot be guaranteed that the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate or will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition 1 – Remediation Strategy

Prior to each phase of development approved by this planning permission the applicant will submit a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the LPA. This strategy will include the following components:

1. Up to date Preliminary Risk Assessment (PRA) and conceptual model following the results of an exploratory investigation
2. A detailed site investigation scheme, based on the results from (1) to provide information for a detailed risk assessment to all receptors that may be affected, including those off-site.
3. A tiered risk assessment using the results of the site investigation referred to in (2).
4. An options appraisal including sustainability and treatability studies of the remediation measures required and how they are to be undertaken.
5. A remediation strategy and verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the

remediation strategy are complete and identifying any requirements for longer-term monitoring of pollutant linkages, mitigation, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the LPA. The scheme shall be implemented as approved.

Reason(s)

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with P2(1-2) and P3(1-2) of the NPPF and to ensure the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate in line with P2(1-2) and P3(1-2) of the NPPF.

Condition 2 – Verification report

Prior to each part of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the LPA. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to the land and water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with P2(1-2) and P3(1-2) of the NPPF.

Condition 3 – Unidentified contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the LPA) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the LPA. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with P2(1-2) and P3(1-2) of the NPPF.

Pollution prevention

The applicant has submitted a Draft Construction Management Plan (CMP) (written by Atlas Planning Group, dated March 2026) which doesn't appear to include information with regards to 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.

We therefore request that the following condition is added to any grant of permission.

Condition 4 - Construction Environmental Management Plan (CEMP)

No development shall take place until a [revised] Construction Environmental Management Plan (CEMP), incorporating pollution prevention measures, has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period. The CEMP shall include as a minimum the following;

- a scheme to treat and remove suspended solids from surface water run-off during construction
- wheel washing facilities and appropriate disposal of effluent
- the use and routing of heavy plant, vehicles and machinery
- oils/chemicals and materials storage including refueling
- the location and pollution prevention for storage areas and compounds
- the control, storage and removal of spoil and waste.

Reason

To prevent pollution of the water environment in line with P3, F8 and N2 of the National Planning Policy Framework.

INFORMATIVE – Permit to discharge

A permit to discharge (Environmental Permit) will be required if the construction period is greater than 3 months and the discharge is to surface waters. Any discharge will be governed by strict limits on suspended solids, pH, and if flocculants are used, an iron or aluminium limit.

ADVICE TO APPLICANT – Monitoring points

In order to ensure the development does not negatively impact on water quality, effluent leaving the site and any watercourses that could be impacted by site run-off should be appropriately monitored. Early in the planning process and as part of the design stages, the applicant should consider how suitable monitoring point(s) for any discharges or watercourses can be achieved. These should be accessible, safe, and appropriate for sampling which may be required as part of an Environmental Permit.

Other issues

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.

Note to LPA/Applicant – Abstraction Licence

If the applicant is proposing non - mains water supply and proposing to abstract more than 20 cubic metres of water per day from a surface water source e.g. a stream or from underground strata (via borehole or well) then they will need an abstraction licence from the Environment Agency in accordance with section 24 Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights.

The applicant should apply for enhanced (paid for) pre application advice to give a more localised assessment of the licensing potential at the site but there is a **very low likelihood** of an all year round licence being granted in this area. This link explains what the process involves and how to apply: [Get advice before you apply for a water abstraction or impounding licence - GOV.UK](#)

Note to LPA

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

Yours sincerely,

Lindsay Grant
Planning Advisor (Wessex - Sustainable Places)

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