

Bassetlaw District Council  
Development Control  
Queens Buildings Potter Street  
Worksop  
Nottinghamshire  
S80 2AH

**Our ref:** LT/2024/128546/01-L01  
**Your ref:** 24/00384/FUL  
**Date:** 26 April 2024

Dear Sir/Madam

**INSTALLATION AND OPERATION OF A SOLAR FARM AND BATTERY ENERGY STORAGE SYSTEM (OUTPUT UPTO 40 MVA), WITH ASSOCIATED WORKS, EQUIPMENT, INFRASTRUCTURE AND LANDSCAPING**

**LAND ADJACENT TO A614, WORKSOP, NOTTINGHAMSHIRE**

**Environment Agency Position**

We have reviewed the Planning Phase Battery Safety Management Plan – Fire Strategy Report (ref: OWC-LO-R70-042000), for One Planet Developments Ltd, dated March 2024, and Flood Risk Assessment and Surface Water Drainage Strategy, with ref no. J-15416, for One Planet Developments Ltd, dated March 2024 for the proposed development.

We agree with proposed recommendations made in section 4.1.5.1 of the Fire Strategy Report for contaminated water mitigation and the recommendations made in the Flood Risk Assessment and Surface Water Drainage Strategy report. That SuDS should be adequately designed and lined to hold contaminated water runoff in the event of a fire from Battery energy storage systems (BESS) firefighting measures to ensure no infiltration or risk of contaminated water entering the ground or controlled waters.

The previous historic and current use of the site may present potential risks to controlled waters. These historic uses are known to present risk or have potentials of contamination that could be mobilised during construction to pollute controlled waters.

It has been proposed in the planning application that foul sewage is not required. We however advise that, in the event a foul sewage disposal is required on site, a scheme for the disposal of foul sewage will need to be submitted to the Local Authority and implemented as approved to ensure no harm to controlled waters or any risk to controlled waters is mitigated.

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

- Located in SPZ 3 (Total Catchment) and partially in SPZ 2.
- Located partially on the superficial geology (Till, Mid Pleistocene), in Secondary aquifer B and mainly located on the bedrock geology (sandstone, pebbly (gravelly) of the Chester Formation), a Primary A aquifer.
- In close proximity to River Poulter.

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npa - Bridgford Point Scarrington Road, West Bridgford, NG2 5BR.  
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[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

We have no objection to the proposed development in principle.

Given the above, we recommend the following condition:

**Condition - Unexpected 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 local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

**Reason**

The site is located mainly above a Primary A aquifer and the above conditions will ensure that the risks to the aquifers and surface water are adequately assessed and mitigated.

To ensure that the development does not contribute to, 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 paragraph 180 of the National Planning Policy Framework.

**Informative – General guidance for BESS developments**

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

- Applicants should engage with Local Fire & Rescue Services 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 to refer to [guidance produced by the National Fire Chiefs Council](#) for consideration when determining applications and consult with local Fire & Rescue Services before issuing decisions.
- Applicants will also need to comply with relevant Building Regulations in [Part B](#). They require applicants to provide suitable access for the fire service.

**Informative - Management of end of life industrial batteries**

Battery energy storage systems (BESS) facilities are not regulated under the Environmental Permitting Regulations regime.

However, battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs.

Batteries have the potential to cause harm to the environment if stored inappropriately e.g. subject to a fire as the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place.

The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.

Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.

Yours faithfully,

**Mr Joshua Milsom**  
**Planning Advisor**

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