



The Examining Authority
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AN/2023/134186/06-L01
Your ref: EN010149
Date: 04 September 2025

Dear Members of the Examining Authority

**Order Granting Development Consent for the Springwell Solar Farm Project -
comments on additional submissions received by Deadline 3 (Deadline 4)**

1.0 Introduction

1.1 Pursuant to Deadline 3, the Environment Agency (EA) notes that the Examining Authority invites comments on any submissions received at Deadline 3. Accordingly, we provide comments on the following submission:

2.0 Outline Operational Environmental Management Plan [[REP3-039](#) Clean; [REP3-041](#) Tracked]

2.1 We do not welcome the amended wording to Table 6 (Land, soil and groundwater) that "*The drainage system will be designed to capture water during a thermal runaway event at the BESS, where it can be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time) preventing accidental release to the surrounding environment*". The wording included now makes no reference to the need for the drainage system to be designed to capture firewater during a fire event at the Battery Energy Storage System (BESS). It therefore gives no certainty that firefighting water runoff will be captured during a fire event at the BESS and that highly polluting chemicals in batteries will be prevented from entering the water environment (groundwater and surface water).

2.2 As explained in our previous representations and during Issue Specific Hearing 3, this development is situated in a sensitive location for groundwater resources that provide significant quantities of drinking water and it is therefore essential that appropriate mitigation is secured to protect the underlying aquifer and water environment.

2.3 With this in mind, we request the wording is revised to make reference to firewater. We suggest the following wording:

The drainage system will be designed to capture water during a thermal runaway event or fire at the BESS, where it can be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time) preventing accidental release to the surrounding environment.

Environment Agency
Nene House Pytchley Lodge Road, Kettering, Northamptonshire, NN15 6JQ.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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Should you require any additional information, or wish to discuss these further, please do not hesitate to contact me on the details below.

Yours sincerely

[REDACTED]
Sustainable Places – Planning Specialist

Direct dial [REDACTED]

Direct e-mail [REDACTED] [@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)