

Cumberland Council  
Development Control  
The Copeland Centre Catherine Street  
Whitehaven  
Cumbria  
CA28 7SJ

**Our ref:** NO/2026/117303/01-L01  
**Your ref:** 4/26/2022/0F1  
**Date:** 02 February 2026

Dear Sir/Madam

**PROPOSED EXTENSION TO EXISTING BATTERY STORAGE FACILITY**

**WOODEND FARM, WOODEND, EGREMONT**

Thank you for consulting us on the above planning application.

**Environment Agency position**

We have no objection in principle to the proposed development but wish to make the following comments:-

**Emergency response and contingency planning for BESS developments**

The proposed development includes Battery Energy Storage. Should battery containers become exposed in the event of a fire, highly polluting chemicals in batteries could enter groundwater through firewater or rainfall runoff potentially affecting groundwater quality. This would be contrary to paragraph 187(e) of the National Planning Policy Framework. The local planning authority should ensure appropriate mitigation is in place for the containment of surface water and rainfall runoff in the event of a fire and subsequent disposal of this contained water off-site.

While in the event of a fire at a Battery Energy Storage System (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 water run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, water could enter exposed containers through rainfall during the period it takes to remove or cover burnt out containers.

Any development proposal utilising BESS should have emergency response/contingency plans which detail how those risks as detailed above will be

managed and environmental impacts prevented, reduced, removed or contained. These plans should ensure that no polluted runoff enters groundwater under the site.

The Department for Energy Security and Net Zero: [Health and safety in grid scale electrical energy storage systems](#), provides guidance on emergency planning.

Any plan for each site must include the EA Incident Number 0800 80 70 60 for prompt operator reporting so that the EA can risk assess the incident and risk to the environment.

### **Boreholes to abstract water in the event of a fire – Groundwater Investigation Consents**

The Environment Agency regulates the abstraction of water from surface water and groundwater. An abstraction licence is not needed to install and test a borehole solely for the purpose of firefighting (including training and testing). It is recommended the operator of the site obtains a groundwater investigation consent (under section 32/3 of the Water Resources Act 1991) so they can find out whether there is adequate water available. See [Apply for consent to investigate a groundwater source](#) - GOV.UK ([www.gov.uk](http://www.gov.uk)) for further information.

Yours faithfully

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