

In terms of the NRW comment, please see our response in the table below. In summary, we trust that the majority of the requested can be conditioned and implemented pre-commencement of development. If you could please confirm, that would be much appreciated.

Comment	Response
The proposed trenching and cabling design, including the depth and method of excavation.	The proposed trenching and excavation plan would be in line with National Grid requirements due to the presence of 132kVA lines in the vicinity of our proposed trenching. This would require the appointed contractor to excavate the majority of this area by hand. The depth of the excavation required would be determined by the Principal Contractor, Designer and National Grid at the appropriate stage of delivery. Note that this proposed trenching area is not on the landfill area and is currently a hard standing carpark area / road around the back of the vehicle hangar.
A Phase 1 Risk Assessment focusing on relevant contaminated land and characterisation of ground materials in relation to the proposed trenching.	A Phase 1 Risk Assessment will be provided by the contractor at the appropriate time. Given the above response, I trust you are happy for this to be a pre-commencement condition on the permission.
The potential to encounter unsuspected contamination.	Happy to accept this as a condition and if any unidentified contamination is found, all works will cease and appropriate action will be taken.
The potential to encounter contaminated groundwater which could be tidally influenced. The significance of this risk would be informed by the depth of cable trenching required. Any contaminated groundwater may need to be managed if the excavation needs to be kept dry in order to install the cabling. A discharge permit may be required to manage contaminated groundwater.	As above, proposed trenching would be in line with National Grid requirements and will be outside of the landfill area. The trenching will be limited to below surface works and will not be to a depth that will incur any groundwater. The depth of the excavation required would be determined by the Principal Contractor, Designer and National Grid at the appropriate stage of delivery. Therefore, happy for this to be a condition.
The management of the excavated materials from the trenching. The environmental quality of materials would need to be determined through appropriate testing if excavated materials will not be re-used, to determine if the excavated materials are hazardous, non-hazardous or inert. If the intention is to reuse the excavated materials or some portion of the materials, this would need to be undertaken via the Definition of Waste Code of Practice (DoW:CoP).	This will need to be confirmed when client goes into contract but the preference would be to re-use excavated material to backfill the trench when cable works are completed, followed by reinstating the road surfacing. All works will be carried out in accordance with the Definition of Waste Code of Practice (DoW:CoP).
Potential landfill gas risk would need to be assessed as any trenching and cabling could facilitate the movement of existing gas generation. Cabling is often bedded into high permeability materials such as sands or pea-gravel. Such materials can preferentially move gases	No excavation works will be carried out in the landfill area.
A Feasibility Study of situating the proposed BESS on legacy landfill including whether the existing hardstanding will be sufficiently load-bearing, the need for piling (including a piling risk assessment if piling is proposed), possible excavation of ground material for foundations and landfill gas risks including the potential to exacerbate the effects of a BESS fire. Operational and de-commissioning risks should also be considered. Tidal influence on shallow groundwater may also affect the generation and migration of landfill gas and this should be considered in relation to the operating BESS.	Stantec to prepare a supplementary technical note confirming that there will be no issues on stability and the BESS can be located on existing hardstanding.
The proposed scheme involves the storage of large battery systems containing lithium ion electrolytes and hydrocarbons which have the potential to cause pollution in the event of fire at the site as a result of battery failure. We are not the expert body to advise as to whether measures proposed by the applicant to minimise the risk of fire, or to suppress a fire at the site are adequate. We recommend that you seek advice from a Battery Energy and Electrical process safety expert and the relevant Fire and Rescue Service in determining whether the proposed measures to minimise the risk of fire, and to suppress a fire at the site are adequate.	The developer will ensure suitable safety measures to contain and restrict the spread of fire, using fire-resistant materials and adequate separation between locations where energy systems may be stored. Biodiversity enhancement in the form of additional hedgerows have been limited to the southern perimeter to ensure that flammable materials are not located in close proximity to the BESS.
Before determining the planning application, you should be satisfied that in the event of a fire all contaminated firewater can be fully contained on site and cannot enter the wider environment. We advise that measures to avoid pollution from contaminated firewater should be clearly set out by the applicant and provide sufficient detail in support of the planning application.	A pollution prevention plan will be submitted prior to commencement of development, this can be conditioned on the permission.