

4th March 2026

Northern Ireland Environment Agency & Marine and fisheries Division (NIEA & MFD)

Water Management Unit & Planning Response Team

NIEA Lisburn

17 Antrim Road

Tonagh

Lisburn

BT28 3AL

To whom it may concern,

Planning Application Ref : LA02/2025/0842/F

Response to ' 34 Ballyvallyagh BESS DAERA' Section reference WMU/PC/38304-1

This letter is to support the clarification of the contaminated 'firewater' outline strategy for the proposed Ballyross BESS. On 18.12.25, RPS received a letter from the Water Management Unit (WMU) regarding the outlined firewater mitigation strategy, see the selected text below for the focal point of this letter.

"The drainage plan should include drainage from all areas associated with the BESS and clearly detail all elements that will be incorporated into the drainage system of the BESS to prevent any "firewater" entering the environment. Water Management Unit notes the drainage

assessment includes drainage plans, however due to the limitations in viewing the plans contained within the document on a computer it is not possible for Water Management Unit to determine if the required details are in place. If the plans do include the requisite details, then Water Management Unit apologises for the inconvenience.

The drainage plan should clearly show all surface water, contaminated surface water (including firewater) drainage and foul, as well as the siting of any proposed oil separators, sumps, silt traps, outlet shut off valves with their associated drainage channels. The destination of all drainage should be clearly stated and identified (i.e., where it is proposed to discharge to foul sewer, combined sewer, surface water sewer, underground stratum, or waterway etc.). Water Management Unit request that the drainage system be colour coded (surface water (clean and potentially contaminated) and the direction of flow indicated)."

Within the originally submitted SuDS report, document **794-ENV-HYD-21833 Ballyross SuDS Report v0.1**, an outline of the firewater mitigation strategy was provided. However, RPS appreciates the request for further clarification on the strategy.

Firewater mitigation strategy

The proposed strategy includes a penstock valve, located upstream of the ultimate discharge point) which can be manually operated and closed off should a fire occur. In the event of a fire, it is proposed that any contaminated fire will be intercepted by the proposed gravel subbase (located beneath the Battery Units). From there, the firewater will be stored within the proposed attenuation, predominately within the proposed attenuation basins, which are lined with an impermeable geotextile to prevent groundwater contamination. Following the fire event, the potentially contaminated firewater will be tested to check whether the water is suitable for discharge to the local network, if not it will be pumped out of the attenuation features by a suitably qualified contractor, prior to the penstock valve being opened.

The proposed on-site attenuation has been designed to handle the worst-case scenario for firewater and storm event simultaneously. The proposed attenuation features have sufficient capacity to storage the critical storm (1in100 +20%cc) as well as an additional 228m³ of firewater (equivalent to 1900l/min for 120 minutes, in accordance with National Guidance). Please see the calculations below for further details.

Required attenuation for critical storm event = 1594m³

Firewater = 228m³

Total attenuation required = 1822m³

Attenuation provided within proposed strategy = 3991m³

To support this, the conceptual drainage plan has been updated to provide more details regarding the firewater mitigation strategy, please see the attached plan **21833-RPS-SD-ZZ-DR-D-D100-RevD**. Regarding the colour coding of the water strategies, due to the nature of the site, only surface water runoff and firewater has been considered. Furthermore, as the firewater will follow the same path and strategy as the surface water, they have not been shown individually.

I hope this letter, and the revised drainage plan, provide the clarification required for your query. Should more information be required, please contact me to discuss.

Yours faithfully,



Ryan Macbeth,

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