

Comments on Applicants Documents April 2026 and other points.

The applicants **hydraulic modelling report** (EN010141 April 2026) does not provide an assessment of flooding pre and post development and only seems to review the on-site implication of flooding. Presumably, it is assuming that there is no off-site implication, on the basis that the solar farm will not change the runoff characteristics of the land. However, this is unlikely to be the case as such a development can reduce the amount of rainfall absorbed into the ground and increase the rate and volume of surface water runoff, which can increase flood risk. Specifically, the panels themselves can contribute to increases in total runoff, while the ability of the land to absorb water will be significantly reduced through the replacement of large areas of existing greenfield with access tracks.

Modelling has also not considered the potential influence of the following engineering proposals that could interrupt or change overland flow routes in comparison to the existing situation.

- \* Proposals to erect panels on concrete foundations raised above ground level in areas of archaeological constraints.
- \* Proposals to erect fencing around the perimeter of solar panel compounds.
- \* Proposals to construct access tracks over existing ditches and watercourses in multiple locations by means of culverting and localised raising of ground levels for construction of suspended slabs and bridges.
- \* Proposals to construct the BESS facility within a flood flow path.

In conclusion, the report is insufficient to demonstrate that the solar farm will not increase flood risk, because it appears to assess only on-site flooding impacts and fails to account for several development features that are likely to alter runoff patterns and overland flow routes. As a result, there is a material risk that the development could increase both on-site and off-site flooding compared with the existing greenfield conditions.

I have also reviewed the **Statement of Common Ground**. Having considered the comments above, I do not agree with the applicant's position that the modelling report adequately addresses items 20 to 22, and I consider that this should not be agreed by the Environment Agency.

**BESS Safety**

Regarding the BESS proposals, has consideration been given in the event of the worst-case flood event coinciding with a fire? In such an instance how would contaminated run off be managed – this needs to be addressed.

**Screening Considerations:**

The long timescales quoted for new hedge row growths and planting are misleading based on the planting at the existing Manor Farm which are completely ineffective after circa 10 years. I urge the inspector to examine these as part of his site visit – several of the routes will enable this to be viewed. By contrast other new hedgerows on Manor Farm [REDACTED] [REDACTED] have reached a decent height in a much shorter timescale. Our own boundary hedgerow consisting normal native species has reached 2.5m in less than 4 years with no special attention so I would suggest the size of the initial planting needs to be reconsidered to make any significant impact on screening in what amounts to a quarter of the planned lifespan of the project.