

The Planning Inspectorate

**Our ref:** XA/2025/100416/01

**Interested Party No.** 20055261

**Your ref:** EN010147

**Date:** 22 August 2025

Via email to:  
botleywestsolar@planninginspectorate.  
gov.uk

To Whom It May Concern,

**Deadline 4 – Environment Agency responses to The Examining Authority's second written questions (ExQ2).**

Thank you for consulting us on the Examining Authority's second written questions and requests for information (ExQ2). We provide our responses in Appendix 1.

Yours faithfully,

**Siobhan Martin**  
**Planning Advisor – National Infrastructure Team**

Email: [NITeam@environment-agency.gov.uk](mailto:NITeam@environment-agency.gov.uk)

**Appendix 1 – Environment Agency's response to second written questions (ExQ2)**

## **Appendix 1 – Environment Agency’s response to second written questions (ExQ2)**

### **2.4.6 Justification for SF6**

The applicant has amended the Outline Layout and Design Principles document to give reasons for not fully adopting an SF6-free development. Do you accept those reasons?

<b>Comment</b>
We understand the switch gear will primarily utilise SF6 free technology. If this is not possible for the 275kV switchgear, we acknowledge the applicant will utilise ‘sealed for life’ options. Therefore, with regard to climate change, the Environment Agency has no further concerns in relation to this issue at this time.

### **2.7.5 Consultation**

The applicant has commented at [\[REP3-065\]](#) that National Highways would be consulted on the final Construction Traffic Management Plan (CTMP) because of an amendment to a paragraph within the outline Code of Construction Practice (CoCP) [ExQ1.7.20]. In a similar vein, the applicant says the Environment Agency would be consulted on the whole CoCP because of a paragraph written into the flood risk assessment [ExQ1.7.27]. This appears to be an unusual and non-standard approach to securing consultation and the ExA strongly suggest the consultees are named on the face of the dDCO. The applicant should update the dDCO accordingly or the consultees (named in this question) should provide written confirmation that the applicant’s current approach is acceptable.

<b>Comment</b>
To confirm, we agree with the ExA’s suggestion that the Environment Agency should be named on the face of the dDCO (Schedule 2 Paragraph 11(1)) to ensure we are consulted on the full CoCP.

### **2.8.3 Fish and the riverbed**

The applicant, at [\[REP3-065\]](#), has said that HDD underneath rivers would only see vibration for a period of 2 weeks and therefore vibration impacts would be minimal. Do you accept this, or do you feel fish surveys are necessary?

<b>Comment</b>
HDD induced vibration for a period of 2 weeks could still have impacts on fish and cause an offence under the Salmon and Freshwater Fisheries Act 1975. As there is no known vibration/ noise value for HDD, we request that sensitive

periods are avoided in order to protect spawning fish. HDD must not take place during the following dates:

- 1st Oct to 31 May (inclusive) to protect salmonids
- 15 March to 15th June (inclusive) to protect coarse fish

During a meeting with the applicant (July 2025), it was agreed that the sensitive periods listed above would be avoided and this would be detailed in the CoCP.

### 2.8.11 *Monitoring mitigation*

ExA question to the applicant – What would happen if ecological monitoring found that a greater adverse effect was being had on a species (i.e. bats, breeding bird assemblage) than the ES envisages? What would the mitigation options be and where are they secured? Would panels be removed to lessen the impact?

Natural England / Environment Agency – Please provide your comments on this matter and what monitoring would achieve without effective mitigation options being tabled or understood at this point in the DCO process.

Comment
We are unable to provide comments at this time and will endeavour provide an update at Deadline 5.

### 2.10.2 *Flood modelling*

In relation to the modelling that has been undertaken, the applicant states [\[REP2-027, page 4\]](#): *“While the current model is uncalibrated and excludes some features (e.g., eastern flow route, culverts, urban pipework), it has identified key flood flow patterns and areas of potential mitigation...the modelling outputs have informed initial mitigation concepts.”*

How reliable and robust are the flood mitigation proposals when they have been informed by uncalibrated and incomplete data?

Comment
Hydraulic models are subject to inherent limitations and uncertainties. While these can be reduced through calibration and verification, formal calibration in this case is constrained by the absence of flow and level monitoring on the Cassington Mill Stream and its associated drainage network. In situations where direct calibration is not possible, it is essential to evaluate model reliability through sensitivity testing of key parameters and validation of model outputs against documented historic flood events where information is available.
Sensitivity testing helps to assess how assumptions—such as the selection of model parameters—affect model outputs. Where results are highly sensitive to input parameters, the associated uncertainty is greater, which can influence the

reliability of any subsequent flood risk management interventions. Conversely, low sensitivity indicates greater confidence in the model outputs. To date, the applicant has undertaken limited sensitivity testing, specifically in relation to culvert sizing, which has been reported to have minimal impact on flood extents and depths. Given the current level of uncertainty in the model results, further sensitivity testing is essential, with particular focus on infiltration losses and surface roughness parameters.

At present, the applicant's direct rainfall hydraulic modelling for Cassington has not been reviewed in detail by the Environment Agency. It is noted that the modelling undertaken to date reflects only baseline (existing) conditions and does not incorporate any of the proposed flood mitigation measures outlined in the applicant's Surface Water Modelling Report [APP-172]. While these baseline model outputs have informed some initial intervention concepts, further modelling is required to assess the effectiveness of any proposed measures in reducing flood risk and to ensure that no interventions inadvertently increase flood risk elsewhere. We have requested that, once the applicant identifies and tests preferred flood risk management interventions within the hydraulic model, the updated modelling is submitted to both the Environment Agency and the Lead Local Flood Authority for detailed review.

#### **2.10.11 Water Supply Strategy**

It is noted in the Statement of Common Ground (SoCG) submitted at Deadline 3 [REP3-047] that the applicant is proposing to prepare a Water Supply Strategy post consent. Please confirm whether the timing of this strategy is acceptable to the EA.

<b>Comment</b>
<p>It is preferred that a Water Supply Strategy is committed to at the pre-application stage and submitted alongside the Environmental Statement for review. However, preparation of the strategy post consent is proportionate at this stage given the applicant has confirmed that mains water supply and/ or off-site supply (tankering and/ or use of bowsers) is intended to cover all demands.</p> <p>It is the applicant's risk if any demands and supply options are underestimated and any permitting requirements cause delays pre-commencement on this basis.</p>

#### **2.17.4 Landfill cabling**

With regards to potentially installing underground cabling in close proximity/ through a landfill, has the applicant sought advice from you about how best to approach this

and, if so, are there sufficient safeguards in place to give you reassurance that contamination, leachate or release of landfill gases would not occur?

<b>Comment</b>
<p>The applicant is yet engage with the Environment Agency about how best to approach the potential installation of underground cabling in close proximity/ through a landfill. We have the following information and advice to offer at this time.</p> <p>As the landfill (Hensington Cutting Landfill Site) is of an historic nature and is not permitted, the regulation of the site would come under the remit of the relevant Local Authority. However, having looked at the information we do hold it appears that in addition to inert, semi-inert and biodegradable wastes, extensive tipping of asbestos also took place at landfill site, so this would need to be taken into consideration if the waste is disturbed. Any disturbance of the waste could create pathways for contamination/ landfill gas/ leachate to migrate. If the applicant chooses to proceed with the option to drill through the waste mass any arisings would have to be sampled and classified in accordance with WM3 (<a href="#">Waste classification technical guidance - GOV.UK</a>) and disposed of at an appropriately permitted waste site.</p>