



The Examining Authority
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AN/2023/134186/03-L01
Your ref: EN010149
Date: 22 May 2025

Dear Members of the Examining Authority

**Order Granting Development Consent for the Springwell Solar Farm Project
Examining Authority's first written questions.**

I refer to the Examining Authority's first written questions issued by the Planning Inspectorate on 13 May 2025.

Our answers to the questions where the Environment Agency is referred to in the 'question to' column are as follows:

9. Land, Soils and Groundwater

Topic: Contamination

Q1.9.7 Question for the Applicant, Lincolnshire County Council and the Environment Agency.

The ES [APP-051, Paragraph 11.8.1.] sets out that an interpretive report is required relating to site investigation work that has already been completed prior to construction works commencing and will be issued to LCC. This will provide further information relating to potential pollutant linkages that were identified in the Preliminary Risk Assessment [APP-115 to APP-118]. In addition, the Preliminary Risk Assessment makes several recommendations, such as shallow intrusive works to determine ground and groundwater conditions, gas monitoring and boreholes.

- a. Is it appropriate to prepare the interpretive report post consent?
- b. Applicant, how are the recommendations in the Preliminary Risk Assessment being addressed?

Environment Agency Answer:

- a. The Environment Agency is satisfied that subject to the mitigation identified in the relevant management plans for the protection of groundwater from leaks or spillages of fuel or chemicals and from contamination during piling or earthworks being fully implemented and best practice methods being followed in respect of pollution prevention, the risk to groundwater is low. We are satisfied that providing the

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interpretive report post consent is acceptable. When all ground investigation works have been completed – the Preliminary Risk Assessment makes recommendations for further intrusive works to determine ground and groundwater conditions etc and we would expect the outcome of these to further inform the interpretive report.

The wording of Requirement 12 (Construction Environmental Management Plan (CEMP)) appears to adequately secure this as no remedial works in respect of any contamination or other adverse ground conditions are permitted to take place until the CEMP has been submitted and approved and it appears to be the intention that the site interpretive report will form part of the CEMP.

Topic: Effects of Firewater on Groundwater

Q1.9.9 Question for the Applicant and the Environment Agency.

Numerous concerns [too many to list] have been raised about the potential for contaminants from a BESS accident to affect groundwater. Further, the EA [RR-130] consider the BESS emergency response plan should consider the potential effect of the release of firewater from the BESS compound on groundwater quality. The ExA note that the oOEMP and oBSMP contain some details in this regard.

- a. Applicant, what is your reply?
- b. EA, what further information is required?

Environment Agency Answer:

- b. The Environment Agency would expect the Battery Energy Storage System (BESS) emergency response plan to include (but not be limited to):
 - Details of the maximum volume of firewater that could potentially be required
 - Details of how this volume of water would be contained, together with any potential volume of rainwater, should the containers/containment area be exposed during and following a fire
 - Details of any other mechanism(s) required to ensure there is no release of contaminated water/chemicals controlled waters
 - Details of any analysis that shall be undertaken to inform an appropriate mechanism for disposal of the water
 - Details of potential disposal mechanisms
 - Detailed drawings, as appropriate

I hope these replies are of assistance.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours sincerely

Sustainable Places - Planning Specialist

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