



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

Our ref: AN/2023/134186/04-L01
Your ref: EN010149
Date: 17 June 2025

Dear Members of the Examining Authority

Order Granting Development Consent for the Springwell Solar Farm Project - comments on additional submissions received by Deadline 1 (Deadline 2)

1.0 Introduction

1.1 Pursuant to Deadline 1, the Environment Agency (EA) notes that the Examining Authority invites comments on any submissions received at Deadline 1. Accordingly, we provide comments on the following submissions:

2.0 Draft Development Consent Order [REP1-006 Clean; REP1-007 Tracked]

2.1 Part 2, Principal Powers, Article 6 & Protective Provisions (Schedule 15)

We welcome the deletion of Article 6 part (f) and are continuing to discuss our request for the deletion of part (d) with the Applicant.

2.2 Requirements (Schedule 2)

2.2.1 Requirement 10 (Drainage)

We welcome the inclusion of the EA as a specific consultee to the discharge of Requirement 10 (Drainage) for the foul water drainage strategy. This now resolves the matters listed in the draft Statement of Common Ground (SoCG) – Environment Agency [REP1-080] at points 2.7 and 2.8.

3.0 Flood Risk Assessment [REP1-050 Clean; REP1-051 Tracked]

3.1 We are pleased the revised Flood Risk Assessment (FRA) takes account of our new National Flood Risk Assessment (NaFRA2) data and assesses its implications for the proposed project.

3.2 Paragraph 3.2.13 states that “*The NaFRA2 mapping does not provide data on flood depths in these areas*”. We are satisfied that the flood depth data reflects the hydraulic modelling findings of the FRA and that flood depths do not exceed 0.45m during the 100 year flood event.

3.3 We are satisfied with the flood risk mitigation measures identified and this now resolves the matter listed in the draft Statement of Common Ground (SoCG) – Environment Agency [REP1-080] at point 2.3.

4.0 Environmental Statement Volume 1, Chapter 3 – Proposed Development Description [REP1-022 Clean; REP1-023 Tracked]

4.1 We welcome the update to paragraph 3.4.22 that “no built structures, including inverters, are located within Flood Zones 2 or 3”. On reflection, this section was not referring to the Solar PV modules themselves, some of which remain in Flood Zone 2 and 3. On this basis, we withdraw our representation on this point, and it resolves the matter listed in the draft Statement of Common Ground (SoCG) – Environment Agency [REP1-080] at point 2.4.

5.0 Document 7.7.2 Outline Construction Environmental Management Plan

(please note this document is incorrectly listed on the Examination Library as document REP1-060 Clean and document REP1-061 Tracked. The links provided on the Examination Library for these documents link to the Grid Connection Statement).

5.1 We have reviewed the Outline Construction Environmental Management Plan (oCEMP) (Tracked and Clean) Revision 2 and although we welcome the addition of wording to Table 8 (Land, Soil and groundwater) on the ‘Discovery of Unsuspected Contamination’ and the procedure to follow if unexpected contamination is encountered during development, we are not satisfied that this is the appropriate place for this control mechanism. The wording included is more akin to a Development Consent Order requirement in itself. Also, the wording included would effectively halt **all** the development works, i.e., “no further development shall be carried out”, which is more onerous than that suggested by the EA, which only required work in the location where contamination was discovered to cease. We will continue to discuss this matter with the Applicant.

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

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