Planning Inspectorate

[via PINS portal]

Our ref: XA/2026/100541

Your ref: EN010163

Date: 17 February 2026

Dear Sir

ENVIRONMENT AGENCY DEADLINE 4: STEEPLE RENEWABLES.

RESPONSE TO DOCUMENTS SUBMITTED AT DEADLINE 3.

We have reviewed the following documents submitted at Deadline 3, and those submitted at Deadline 2 that were not fully reviewed in our Deadline 3 response [REP3-052].

- [REP3-006] Draft Development Consent Order
- [REP3-035] Draft Development Consent Order – Schedule of Changes (Revision 2)
- [REP3-039] Applicants Comments on Deadline 2 Submissions (Revision 1)
- [REP2-006] Outline Fire Risk Management Layout (More detailed comments provided below replace the general comment submitted at Deadline 2)
- [REP2-019] Hydrology, Hydrogeology, Flood Risk and Drainage.
- [REP2-023] Geoenvironmental Desk Study
- [REP2-024 to REP2-028]. Historical Maps
- [REP2-030] Outline Fire Risk Management Plan (More detailed comments provided below replace the general comment submitted at Deadline 2)
- [REP2-037] Water Framework Directive Assessment
- [REP3-012] (oCEMP)
- [REP3-014] (oDEMP)
- [REP3-016] (oOEMP).
- [REP3-022] Surface Water Drainage Strategy. (More detailed comments provided below replace the general comment submitted at Deadline 2).

Our comments are set out below.

A summary of our position is provided in Appendix 1: Work Package Tracker.

[REP3-039] Applicants Comments on Deadline 2 Submissions (Revision 1)

REP2-064/1 Q9.2.19 – We are satisfied with this response. Our initial response was made in error based on a misinterpretation of the function of Article 15 Discharge of water.

[REP3-006] Draft Development Consent Order (DCO)

We have no comment to make regarding the current amendments to the draft DCO.

We request to be included as a named consultee on the following Requirements:

- Requirement 10 – Fire Risk Management Plan (FRMP). We have provided comment on the outline FRMP on aspects of potential relevance to the remit of the Environment Agency – specifically the provision of firefighting water.
- Requirement 9 – Operational Environment Management Plan (OEMP). This document is relevant to the remit of the Environment Agency as per the outline OEMP [REP3-016] Table 3.3 Hydrology, Hydrogeology, Flood Risk and Drainage and Table 3.11 Land Use and Agriculture.
- Requirement 16 – Surface and foul water drainage. We have provided comment on the Surface Water Drainage Strategy which includes maintenance schedules for mitigation measures relevant to the remit of the Environment Agency.

All other documents

Our comments on all the other documents listed at the start of this letter are provided below. Comments are presented as they relate to the issues as set out in the document Applicants Comments to our Relevant Representations [REP1-008].

RR-025/17 (Conceptual Site Model) Resolved. [REP2-023] Geoenvironmental Desk Study Section 4.0 (Conceptual Site Model) and Section 5.0 (Conclusions and Recommendations) has been updated.

RR-025/18 (Maps) Resolved. We are satisfied with the updates to [REP2-023] sections 3.1 and 3.2.

RR-025/19 (Chemical testing) Resolved. Updated document: [REP2-023]. We are pleased to note that Section 5.0 (Conclusions and Recommendations) has been updated and the Recommendations for Ground Investigation (Section 5.4) are now sufficient.

RR-025/20 (Unexpected contamination) Progress ongoing.

[REP3-012] (oCEMP) tables 3.4 and 3.11. The procedure outlined in Table 3.4 is more comprehensive. We would request that an instruction for liaison with the LPA, and the EA if necessary, be added to the instructions for further investigation, remediation strategy, and validation. It would be beneficial to add a note that a detailed discovery strategy will be included in the detailed EMPs, which will need to be agreed with the LPA and EA prior to commencement.

These comments should also be applied to [REP3-014] (oDEMP) and [REP3-016] (oOEMP). (However, in the oOEMP this topic is currently presented under Table 3.11 (Land Use and Agriculture), and should be moved to Table 3.3 (Hydrology, Hydrogeology, Flood Risk and Drainage) to maintain consistency with the oCEMP and oDEMP.)

RR-025/21 (Dewatering) Resolved. The changes made to [REP3-012, REP3-014, REP3-016] add clarity as requested.

RR-025/22 (Water used in firefighting) Progress on-going. Updated documents: [REP2-019] Hydrology, Hydrogeology, Flood Risk and Drainage; [REP2-030] Outline Fire Risk Management Plan; [REP2-006] Outline Fire Risk Management Layout; [REP3-022] Surface Water Drainage Strategy.

The applicant has given further detail about the capture and drainage of firewater in REP3-022 (5.3.12 to 5.3.16, 8.2.2 and 8.2.4). We are satisfied with the proposal to use an automatically operating shutdown valve to seal the BESS drainage system, and the whole BESS area and drainage outfall will be underlain by impermeable membrane.

At present the applicant has not provided enough information to give us confidence that they have fully understood the implications of the BESS drainage design and how contained firewater will be managed. The Drainage Strategy should include an acknowledgment that the following matters will be considered.

1) The type and design of storage tanker: It is proposed to pump contaminated firewater "into a secure storage tanker". Will this be fixed or mobile, above or below ground? Ensure sufficient capacity to hold all captured water for as long as required before an appropriate disposal route can be determined. Secondary containment may be required in case of leakage or spillages.
2) Treatment of firewater: Treatment and discharge on site is likely to require discharge permits (as noted in 5.3.22). The process and timescales for this should be noted in the OEMP, as obtaining a discharge permit can take a significant amount of time. The treatment method and relevant water quality standards will vary depending on the battery chemistry and consequent contaminants in the firewater. Therefore outline treatment options and testing parameters should be considered at this stage, recognising that time will be required to agree detail prior to any treatment.
3) Gravel cleaning: In 5.3.13 it states: "Any standing firewater within the gravel areas will be pumped out using a vacuum tanker and stored in a secure container for analysis. If any contaminants are detected, remediation will involve either washing the lined gravel insitu or removing and replacing the gravel entirely." This method does not adequately consider accumulation of silt and pollutants within the base of the gravel. Contaminants from a fire event may accumulate in the gravel even if firewater runoff is identified as being suitable for release. These contaminants would then be released into the environment over longer periods of time. A procedure for testing the gravel, especially fine-grained sediment accumulation, should be included regardless of water chemistry. There is no discussion of how this wash water will be sourced, captured and disposed of. We would require this information prior to agreeing to this proposed methodology. Wash water must be from a clean source of supply.
4) Source of fire-fighting water: [REP2-030] Outline Fire Risk Management Plan (paragraph 3.3.6), considers the use of an off-site fire hydrant. However, during the ISH2 meeting (11th February 2026) the applicant confirmed that Nottinghamshire Fire and Rescue Service (NFRS) had since rejected this proposal. A piped solution or on-site water storage tanks are now being considered. The applicant has specified the volume of water that will be made available, to be agreed with NFRS based on current NFCC guidance. The applicant must ensure that sufficient clean water is available, including an allowance for refilling the tanks after use. [REP2-006] Outline Fire Risk Management Layout shows two locations for water tanks, but the size is not specified.

RR-025/23 (BESS drainage) Progress on-going. See our comments in response to RR-025/22.

RR-025/25 (WFD GW bodies) Resolved. Updated document: [REP2-037] Commentary has been added to Table 6.3 about the potential requirement for dewatering at any time. In combination with the response to RR-025/21, we are satisfied that this issue is resolved.

RR-025/26 (Historical maps) Resolved. Updated documents [REP2-024 to REP2-028].

RR-025/27 (Unexpected contamination) Resolved.

RR-025/28 (Thermal effects) Resolved.

RR-025/29 (SPZ sensitivity) Resolved. Updated document: [REP2-019] SPZ3 is now defined as medium sensitivity in Table 8.1.

RR-025/30 (BESS drainage drawing) Resolved. Relevant changes have been made to [REP2-006].

RR-025/31 (Borehole data and oCEMP)

1. **Borehole data:** Resolved. [REP2-034] (Appendix 8.2) Table 3.1 has been updated.
2. **Content of oCEMP:** On-going [REP3-012] . The 4 issues previously highlighted are:
    - Temporary Construction Drainage Strategy: On-going. Table 3.4 now confirms a surface and foul water drainage strategy as Requirement 16 and referenced in the detailed CEMP. Most of the requested content to be referenced in the detailed CEMP has been added, however it does not include words to satisfy our request "Further detail on treatment methods will be required to ensure compliance with water quality standards." Please amend the current suggested update to read *"…and treatment methods (ensuring compliance with water quality standards) separately as part of Requirement 16."*
    - Water Management Plan: Resolved. Table 3.4 'Monitoring Requirements' column has been updated as requested.
    - Foul Water Management: Resolved. Amendments to Table 3.4, confirms that the requested items will be included.
    - Pollution Incident and Emergency Response Plan: Resolved. Row headed 'Spillage Risk' has been updated to include a statement that the requested items will be included.

Yours sincerely,

[redacted]

Planning Specialist – National Infrastructure Team

Direct dial [redacted]

e-mail NIteam@environment-agency.gov.uk

Appendix 1 Work Package Tracker

Appendix 1 Work Package Tracker

Subject	Work package	Scope	Method	Results	Mitigation	Requirement	Tier2 (can be resolved in inquiry)	Notes
Flood risk	Flood Risk Assessment						**T2**	A simple calculation is required to support the assertion that floodplain impact will be negligible. This does not need to be modelled.
Flood Risk	Flood Risk Modelling						**T2**	Model for Catchwater Drain has been updated and results appear reasonable. EA requests sight of the updated 1d models for validation of the associated flood risk impacts
Ecology and Fisheries	Decommissioning Plan					**21**		Resolved.
Ground water & contaminated land	Conceptual Site Model							Resolved.
	oCEMP					**7**	**T2**	Issues regarding groundwater testing resolved. Mitigation for unexpected contamination – minor amendment required instruction for dewatering resolved
	oEMP					**9**	**T2**	EA requests to be named consultee for Requirement 9.
	Surface Water Drainage Strategy					**16**	**T2**	Minor issues to be addressed. EA requests to be named consultee for Requirement 16.
	Outline Fire Risk Management Plan					**10**	**T2**	Minor issues to be addressed EA requests to be named consultee for Requirement 10.
Water Quality	oCEMP					**7**	**T2**	1. Temporary Construction Drainage Strategy – minor amendment required, 2. Water Management Plan - Resolved, 3. Foul Water Management - Resolved, 4. Pollution Incident and Emergency Response Plan - Resolved