Planning Inspectorate
Via PINS portal

Reference: OR-0013831/01
Customer reference: EN010169

27 October 2026

Meridian Solar - Deadline 3: Comments on documents submitted at Deadline 2.

Dear Sir,

This response constitutes the Environment Agency Deadline 3 submission.

1. **Responses to ExA's first written questions**

Our response to ExQ1 have been submitted as a separate document, as requested.

2. **Comments on Statement of Common Ground**

We agree with the position as set out in REP2-011 Statement of Common Ground with Environment Agency (Rev 1). Since this submission we have been working with the Applicant and further progress has been made to resolve the issues raised in our Relevant Representation. This has been set out in an updated SoCG to be submitted by the Applicant at this Deadline 3.

3. **Comments on documents submitted at Deadline 2**

- Comments on individual documents are provided below.
- A summary of the Environment Agency position against each of our representations is provided in Table 1.
- Full detail regarding progress against each representation is provided in Appendix 1.

REP2-019 Water Supply strategy

The applicant has provided a good water supply strategy which identifies the water demands of all phases of the project and provides an options appraisal of sources of supply opportunities and limitations relevant to the project.

The Environment agency is confident that operational water demands can be met given that volumes are modest. This also extends to irrigation demands for the 3 years required post construction. Though the applicant has ruled it out, these quantities could be achieved through abstraction which remains outside of regulation.

Peak demand during construction however is of some remaining concern. 4.1.1 identifies 269m3/day as a worse case scenario for peak construction demand. A significant proportion of this includes dust suppression (185.85m3.day). During

prolonged dry weather and drought as we have experienced this year and last, this is a scenario which requires contingency planning.

It is not yet clear that these peak demands can be met from the sources appraised by the report. It is inferred in 4.1.2 that in the absence of water company supply, non-potable supply can be achieved with 3rd party tankered delivery. It does not state if this is based on typical assumptions or worst case. 3.3.3 states that 30m3 is possible per tanker, this would mean 8-9 tankers per day. We trust that the traffic assessment presented in ES Chapter 15: Traffic and Access [APP-066] as stated has considered these tanker movements as this section only assumes 2-3 tankers per day.

Overall, we are satisfied that the applicant has considered what opportunities and limitations there are for water supply in this region. There remain options not currently being considered which include de-minimus abstraction (outside of regulation); and licence trading which can be considered as part of a multi source supply approach.

REP2-005 Outline Construction Environmental Management Plan, Appendix A – Outline Flood Emergency Response Plan (OFERP)

While evacuation routes and indicative evacuation times have been identified, the OFERP does not adequately assess the flood hazard to people using those routes. In particular, it does not sufficiently consider flood depth, velocity, rate of onset and duration of flooding. We recommend the applicant refer to Government guidance FD2320/FD2321, particularly the methodology for identifying a flood hazard rating, to demonstrate that evacuation routes and refuge locations would remain safe for site users.

We accept the flood depth and speed of-onset information currently presented within the OFERP. However, following completion of the new 2D modelling for the Gotts Catchment, the OFERP should be updated to incorporate additional speed-of-onset information.

Based on the information provided, the EA cannot confirm that all proposed evacuation routes and evacuation points would remain safe and accessible during flood conditions. Further flood hazard assessment is required.

The assessment of the overall adequacy of the evacuation strategy, refuge locations, site management arrangements and emergency supplies is a matter for the Local Authority.

In relation to the EA's roles and responsibilities set out in section 4.1.1, we would like to clarify the following:

- The EA is responsible for flood forecasting and warning for main rivers and the sea and for maintaining flood risk assets within its remit. However, not all flood defences, culverts, screens or watercourses are EA-owned or maintained, and responsibilities may rest with local authorities, internal drainage boards, riparia owners or other bodies. Therefore, the statement

suggesting the EA monitors and clears all culverts or repairs all flood defences breaches should be amended to accurately reflect the limits of the EA's responsibilities.

REP2-018 Post ISH1 Sequential and Exception Tests

Concerns remain regarding the proposed construction compounds within Flood Zone 3b. It should be demonstrated why the compounds could not be located within areas of lower flood risk. Further assessment is needed to demonstrate that they will not obstruct flood flow routes or adversely affect floodplain function.

For the Exception Test, the applicant states that opportunities to reduce flood risk have been explored, but further evidence should be provided to demonstrate what alternatives were considered and why no additional flood risk reductions were achievable.

Table 1: Summary of EA current position against each representation:

Topic	Rel.Rep.	Issue	Status
dDCO	EA1	Preliminary works not covered by CEMP	Resolved
dDCO	EA2	Disapplication of Flood Risk Activity permits	Unresolved
dDCO	EA3	Environment Agency as a named consultee for requirements	Resolved
dDCO	EA4	Use of phrase 'Substantially in accordance with'	Unresolved
dDCO	EA5	Protective Provisions	Unresolved
dDCO	EA6	Discharge of requirements	Unresolved
Flood risk	EA7	Flood zones and site layout	Resolved
Flood risk	EA8	Insufficient consideration of flood defence assets	Resolved
Flood risk	EA9	Inadequate recognition of the Crowland and Cowbit Washes as a designated large raised reservoir	Resolved
Flood risk	EA10	Inadequate understanding of tidal flood risk	Resolved
Flood risk	EA11	Inconsistent approach to sensitivity testing for climate change	Resolved
Flood risk	EA12	Development in flood zone 3b	Unresolved
Flood risk	EA13	Exception Test	Unresolved
Flood risk	EA14	Impact of flood bunding	Resolved
Hydraulic modelling	EA15	Design event used for volume loss calculations is unclear	Resolved

Hydraulic modelling	EA16	Conflicting information regarding flood defence standard of protection	Resolved
Hydraulic modelling	EA17	Bund wall heights	Resolved
Hydraulic modelling	EA18	Assessment of volume losses for the Gotts Catchment	Resolved
Hydraulic modelling	EA19	Mitigation measures for solar PV panels	Resolved
Hydraulic modelling	EA20	Firewater management for Substation	Resolved
Groundwater & Contaminated land	EA21	Contaminated Land Assessment	Resolved
Groundwater & Contaminated land	EA22	Risk to groundwater from trenchless crossings	Resolved
Groundwater & Contaminated land	EA23	Unexpected contamination protocol	Resolved
Ecology	EA24	Omission of fisheries legislation	Unresolved
Ecology	EA25	No fish surveys undertaken	Unresolved
Ecology	EA26	Fish scoped out of EIA	Unresolved
Ecology	EA27	Fish impacts from fragmentation/ barriers to dispersal	Unresolved
Ecology	EA28	Grid connection route	Unresolved
Ecology	EA29	Eel entrapment	Unresolved
Ecology	EA30	Ecological impacts of watercourse trench crossings	Resolved
Geomorphology	EA31	Duration of ‘temporary’ works	Resolved
Geomorphology	EA32	Use of pipe culverts	Resolved
Geomorphology	EA33	Open cut trenched cable crossings	Resolved
Water quality	EA34	Water quality monitoring	Unresolved
Water quality	EA35	Watercourse receptor importance	Resolved
Water quality	EA36	Water quality baseline	Unresolved
Water quality	EA37	Foul water management is unclear	Resolved
Water quality	EA38	Concrete mitigation measures not detailed	Resolved
Water quality	EA39	Wash water	Resolved
Water quality	EA40	Fuel, chemical & oil storage	Unresolved
Water quality	EA41	Substation impacts	Resolved
Water quality	EA42	Bunding around transformers	Resolved
Water quality	EA43	Firewater testing prior to discharge	Resolved

Water quality	EA44	EA as consultee for Emergency Response Plan	Resolved

Yours sincerely,

[redacted]

Planning Specialist – National Infrastructure Team

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

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Appendix 1: Detailed responses

Topic	Matter Raised	Applicant's Response	EA Response
Estates			
Estates	The EA as landowner has contacted the applicant's solicitor regarding the proposed compulsory acquisition of Environment Agency land as part of the scheme. The current order limit boundary indicates that a small slither of in-land drainage ditch/bank has been included, which forms part of the adjacent statutory Flood Storage Reservoir (FSR). This land is managed in accordance with the requirements of the Reservoirs Act. It is not clear why compulsory acquisition of this parcel of land is required. The EA may require access rights across the scheme for inspecting the FSR, as well as permanent clear access for	The Applicant has updated the **Land Plan and Crown Plans – Solar Development Area** (Doc Ref. 2.4 Rev 2), **Book of Reference** (Doc Ref. 4.3 Rev 2), **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and the **OLEMP** (Doc Ref. 7.16 Rev 1) to exclude any works from the land within the ownership of the EA. In addition, the Applicant has updated **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A Outline Landscape Masterplans** of the **OLEMP** (Doc Ref. 7.16 Rev 1) to show an 8m buffer from the EA land ownership boundary and to provide an access arrangement to the FSR. These requirements have also been included	**Update at Deadline 3: Ongoing** We are satisfied that the updated Land Plan REP1-004 excludes any works from the land within the ownership of the EA, and that this is reflected in the Book of Reference REP1-011 which removes any reference to the compulsory aquisition of EA land. We are satisfied that access across the scheme, and permanent clear access to the reservoir banks has been secured in the outline management plans.

Topic	Matter Raised	Applicant's Response	EA Response
	maintenance and repairs to the reservoir banks.	within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) submitted at Deadline 1.	We seek further clarification regarding EA rights relating to land parcels A1-3 and A1-9
Draft Development Consent Order			
EA1 Preliminary works not covered by Construction Environment Management Plan	The definition of the word 'commence', together with the wording of Requirement 12, have the consequence that the Construction environmental management plan may not be applied to permitted preliminary works. The mitigation commitments secured via the oCEMP will not be applied to preliminary works, creating a risk of pollution to the water environment. Amend the wording of Requirement 12 such that "commence" includes any permitted preliminary works.	The Applicant agrees that, as drafted, the interaction between the definition of "commence" and Requirement 12 could permit certain permitted preliminary works to be undertaken before a construction environmental management plan ("CEMP") has been approved. Requirement 12 of the **Draft DCO** (Doc. Ref. 3.1 Rev 2) has therefore been amended so that it applies to specified permitted preliminary works, including intrusive surveys and investigations, site preparation works, remediation works, apparatus diversions and site clearance activities. Certain low-risk activities, including non-intrusive surveys, removal	**Update at Deadline 3: Resolved**

Topic	Matter Raised	Applicant's Response	EA Response
		of plant and machinery, temporary fencing and site security, temporary site notices and advertisements, and advance planting, remain excluded from the requirement. The Applicant considers that the amended drafting appropriately secures the mitigation measures contained within the CEMP whilst avoiding unnecessary approval requirements for activities for which a CEMP is not required.	
EA2 Disapplication of Flood Risk Activity Permits	The applicant wishes to disapply Environmental Permitting in respect of flood risk activity. A general request has been made, but further details have not been provided hence agreement is yet to be secured. Risks to the water environment may not be adequately managed. Provide details to include the nature, location and the associated environmental risks of the activities for which	The Applicant has continued to engage with the EA since the submission of the DCO Application on the disapplication of flood risk activity permits by the Scheme. This included providing further clarification as to the locations within the Order Limits where proposed works overlap with the River Welland floodplain extents, the types of works proposed within these areas, the key flood risk mitigation measures and design	**Update at Deadline 3: On-going** We are now satisfied that FRAPs will not be required for the development of this scheme. Specifically, all works are beyond the 8m fluvial or 16m tidal setback, and so would not be subject to an environmental permit under the Environmental Permitting Regulations.

Topic	Matter Raised	Applicant's Response	EA Response
	disapplication is sought. We will then be able to advise the planning inspectorate if it is appropriate to disapply.	parameters for those areas and how those measures are secured within the DCO Application. The Applicant and the EA continue to negotiate the drafting of bespoke protective provisions which would support this disapplication.	The revised outline Construction, Operational and Decommissioning Environmental Management Plans [REP1-061, REP1-063, REP1-065], and REP1-024 Indicative Solar PV Area, now provide an 8m buffer and access to the Crowland and Cowbit Washes Flood Storage Reservoir. This would remove the need for the inclusion of the Environment Agency Protective Provisions in the DCO. We await review of a revised dDCO with EA protective provisions removed to mark this point as resolved.
EA3 Environment	The Environment Agency is currently not included as a named consultee for:	The Applicant notes that the Environment Agency is already identified as a	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
Agency as a named consultee for requirements	Requirement 6 – Battery safety management plan Requirement 10 - surface and foul water drainage If the Environment Agency is not named on the relevant requirements, then we may not be able to secure the required details post-consent. We request to be named as consultee for Requirements 6 and10	consultee for Requirement 6 (Battery Safety Management Plan) pursuant to Requirement 6(3) of the **Draft DCO** (Doc. Ref 3.1 Rev 2). No amendment is therefore considered necessary in relation to Requirement 6. The Applicant notes the Environment Agency's request to be included as a consultee for Requirement 10 (Surface and Foul Water Drainage). In response, the Applicant has amended Requirement 10 in the **Draft DCO** (Doc Ref. 3.1 Rev 2) submitted at Deadline 1 to include the Environment Agency as a consultee.	
EA4 Use of phrase 'substantially in accordance with'	The use of the phrase 'Substantially in accordance with' in requirements undermines enforceability and creates unnecessary uncertainty. Requirements cannot be enforced appropriately and topic details which have previously been agreed and information	The Applicant notes the Environment Agency's comments. The Applicant considers that the phrase "substantially in accordance with" is appropriate and reflects established DCO drafting practice, providing flexibility for minor changes which may (for example) be	**Position at Deadline 3: Unresolved.** EA maintains its position.

Topic	Matter Raised	Applicant's Response	EA Response
	that the EA has based its position on can be undermined. Remove the word substantially from all requirements.	required to reflect detailed design or the most up to date survey information at the time of construction whilst ensuring consistency with the certified outline documents. Similar drafting has been adopted by the Secretary of State for environmental management plans and other certified documents on recent solar NSIP projects, including One Earth Solar Farm Order 2026, Tillbridge Solar Order 2025 and Fenwick Solar Farm Order 2025. In addition, the detailed versions of the Environmental Management Plans and Battery Safety Management Plan must be submitted to the relevant planning authority for approval following consultation with the Environment Agency, in accordance with the relevant requirements in Schedule 2 to the **Draft DCO** (Doc Ref. 3.1 Rev 2). This provides the Environment Agency with the opportunity to review and comment on	

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		the detailed plans and to ensure that all relevant mitigation and management measures have been appropriately incorporated prior to implementation. The use of the phrase "substantially in accordance with" therefore provides appropriate flexibility for detailed design development whilst maintaining regulatory oversight and consistency with the certified outline documents.	
EA5 Protective Provisions	The applicant wishes to disapply but our standard Protective Provisions have not been included in the dDCO. Risk that non standard wording of protective provisions could create legal uncertainty and risk to enforcement, with the potential for risk to the Environment. If disapplication is approved then the standard EA protective provisions should be included.	The Applicant has been engaging with the Environment Agency in relation to the disapplication of relevant permits and consents and the replacement of those controls through protective provisions within the **Draft DCO** (Doc Ref. 3.1 Rev 2). The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with the Environment Agency. Those negotiations remain ongoing and the Applicant will	**Update at Deadline 3: On-going** **Please see comments against EA2.**

Topic	Matter Raised	Applicant's Response	EA Response
		continue to engage with the Environment Agency throughout the examination with a view to agreeing an appropriate position.	
EA6 Discharge of requirements	There is insufficient time for a named consultee to review and respond to the discharge of requirements to request further information. The LPA must consult a named consultee within 5 working days of receipt of any application to discharge requirements. From the receipt of the consultation the LPA then has a total of 15 working days to request further information. Therefore , the named consultee has just 10 working days to review the consultation & determine if sufficient information has been provided. Risks to the water environment may not be adequately managed. Amend wording to provide 15 working days for named consultees to review the consultation & determine if sufficient information has been provided.	The Applicant considers that the discharge of requirements procedure in Schedule 14 provides an appropriate and proportionate process for consultation and the identification of any further information requirements. The drafting is consistent with that adopted by the Secretary of State in other recent solar NSIP DCOs, including the Tillbridge Solar Order 2025. In addition, Schedule 14 already provides flexibility for alternative timescales to be agreed in writing between the undertaker and the relevant planning authority where appropriate. The Applicant therefore does not consider that the proposed amendment is necessary.	**Update at Deadline 3: Remains Unresolved.** We maintain our position that we require 15 working days for named consultees to review the consultation & determine if sufficient information has been provided. The SoCG submitted at Deadline 2 sets out the applicant's intent to revise the dDCO to extend the period for requesting further information from 15 working days to 20 working days. We are satisfied with this response, and await review of revised dDCO to mark this as resolved.

Topic	Matter Raised	Applicant's Response	EA Response
Flood Risk			
EA7 Flood zones and site layout	Detailed flood modelling is available but has not been consistently used to inform site layout. Instead, the FRA reverts to standard Flood Zone classifications to define site suitability and to demonstrate the application of a sequential approach to site layout. Risk of over-simplification of the true extent and nature of flood risk across the site, which could impact on layout design. The FRA should be revised to ensure the design and spatial layout is informed by the most up-to-date and site -specific modelling outputs (as approved by the EA). This would ensure the development is directed to areas of lowest risk, taking into account both defended conditions and residual risks from potential defence failure.	The Scheme layout has not been informed solely or primarily by the standard EA Flood Zone classifications. Whilst the Flood Zone information was used at the Site selection stage, subsequent design development and refinement of the Scheme layout has been informed by the site-specific hydraulic modelling undertaken for the Scheme. **ES Appendix 11-3: Flood Risk Assessment (FRA)** (Doc Ref. 6.3 Rev 2) discusses the Sequential Test in relation to both the broader Site selection process and the Scheme layout development following the detailed modelling undertaken. Paragraphs 6.2.1 to 6.2.6 of the **FRA** (Doc Ref 6.3 Rev 2) discuss the alternative site selection of the proposed location of the Scheme and paragraphs 6.2.7 to 6.2.14 discuss the detailed modelling approach to the layout of infrastructure across the Scheme to	**Resolved at Deadline 2.** The Applicant's response is accepted. The issue previously raised arose from the use of Flood Zone terminology being used to describe modelled flood extents that include climate change allowance. Our original comments assumed the references related solely to Flood Zones shown in the Flood Map for Planning. The Applicant provided clarification on this at ISH1 and during EA/Applicant meeting on 16 September 2026.

Topic	Matter Raised	Applicant's Response	EA Response
		avoid areas at risk of flooding, from all sources, as far as reasonably practicable. Site selection was informed by the strategic flood risk information available at that stage. As the Scheme design progressed, detailed site-specific hydraulic modelling has been undertaken and has been used to inform the refinement of the layout and the location of infrastructure. The hydraulic modelling considered both the defended scenarios and the residual flood risk associated with defence breach events. The resulting outputs informed the infrastructure siting and the design of flood mitigation measures across the Scheme. In summary, the detailed hydraulic modelling has informed the Scheme layout development as follows: Work No 1 boundary on **Works Plans** [APP-009] has been drawn to exclude areas of Flood Zone 3b of the Postland Catchment and	

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		South Holland Main Drain hydraulic modelling (except for Gotts catchment); On-Site 132 kV substation in Parcel B was moved into Parcel C to minimise overlap with the River Welland breach extent following statutory consultation (this was consulted on as part of the targeted consultation); Solar stations have been moved out of areas of Flood Zone 3a and Flood Zone 3b associated with Postland Catchment and South Holland Main Drain Catchment (except for Gotts catchment) in the illustrative design and the commitment is also set out within **Design Parameters** (Doc Ref. 7.4 Rev 2); Heights for raising infrastructure or the height of bunds / flood defence walls are specified within the **Design Parameters**	

Topic	Matter Raised	Applicant's Response	EA Response
		(Doc Ref. 7.4 Rev 2) on the basis of the hydraulic modelling outcomes. In summary, it is considered the Scheme layout has fully considered the impacts of detailed hydraulic modelling, in terms of locating infrastructure and providing mitigation to ensure the Scheme operates in times of flood.	
EA8 Flood defence assets	There is insufficient consideration of EA flood defence assets. There is limited information regarding the construction, condition and standard of protection (SoP) of defences, and limited consideration of the interaction with the proposed development. Key tidal defences along the River Welland (from Fosdyke to Fulney Lock and Marsh Road Sluice in Spalding), and along the frontage of the Washes, are not adequately recognised. There is a lack of clarity regarding the proximity of the development to the Crowland & Cowbit	The Applicant has submitted an updated **FRA** (Doc Ref. 6.3 Rev 2) and **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) at Deadline 1 to address the further questions raised in the relevant representation regarding the Environment Agency (EA) flood defence assets located near the Scheme. Further details are provided in the rows below.	**Resolved at Deadline 2.** The additional information and clarification provided by the Applicant is accepted. Based on the information submitted, the operational scheme appears to be sufficiently set back from main rivers and flood defence assets. As a result, Flood Risk Activity Permits (FRAPs) are unlikely to be

Topic	Matter Raised	Applicant's Response	EA Response
	Washes defences, and provision of access to these assets. Risk of impacts (structural integrity and access) to flood defence assets which could compromise their effectiveness.		required. This should be reflected in ongoing discussions regarding the disapplication of FRAPs (EA2) and Protective Provisions (EA5), as these matters may no longer be required.
	Update the FRA and ES to provide a comprehensive assessment of EA defences across the site and surrounding area. This should include: • Clear identification and mapping of all relevant defences, including tidal and fluvial assets	**ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 1) identifies and maps the relevant tidal and fluvial flood defences associated with the River Welland. The nearest flood defence asset is located within the Order Limits at the western border section of Land Parcel A, which is a drainage ditch associated with the outer Barrier Bank embankment defence of with Crowland and Cowbit Washes. This can also be seen within the context of the Scheme layout on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1).	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
	• Detailed information on the condition, standard of protection and functional role of these defences	The Environment Agency AIMS database indicates the Barrier Bank has an average condition rating of 2 along the Washes, with one section with asset ID: 503834 by Queens Bank as grade 4 with a target grade of 2; however the last inspection is noted as 2024, and was due inspection in 2025. It is anticipated the Environment Agency will have rectified any concerns from the condition grade 4 at this location through their role as owner and undertaker of the Statutory Reservoir (as noted in the AIMS database). Paragraph 4.3.4 of the **FRA** (Doc Ref. 6.3 Rev 2) has been expanded, and paragraphs 4.3.5 to 4.3.8 included, to provide additional information on the functional role of the flood defences along the River Welland in managing tidal and fluvial flood risk. The tidal flood defences include Fulney Lock, Marsh Road Sluice, and the fluvial defences	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		include Crowland and Cowbit Washes, a Large Raised Reservoir for flood storage. Information on the condition and Standard of Protection (SoP) of the relevant EA flood defence assets has also been incorporated into this section of the FRA, using data obtained from the EA's Spatial Flood defences database. In addition, paragraph 4.3.10 of the **FRA** (Doc Ref. 6.3 Rev 2) discusses tidal flood risk and confirms that the tidal limit of the River Welland is controlled by the tidal sluices at Fulney Lock and Marsh Road Sluice, Spalding. The tidal defences at Fulney Lock and Marsh Road Sluice provide protection up to the 0.5% AEP (1 in 200 year) event, as set out in the EA's current Catchment Flood Management Plan for Anglian Region[1]. Detailed hydraulic modelling confirms the River	

[1] Environment Agency (2022) Anglian River Basin District Flood Risk Management Plan 2021 to 2027. Available at: https://assets.publishing.service.gov.uk/media/6374f46ae90e07285214048f/Anglian-FRMP-2021-2027.pdf [Accessed 23/07/2026]

Topic	Matter Raised	Applicant's Response	EA Response
		Welland fluvial defences (Crowland and Cowbit Washes) provide protection for the 0.1% AEP plus 28% climate change event. It is concluded that tidal flood risk to the Scheme represents a low residual risk associated with the potential failure or overtopping of these structures, which are maintained by the Environment Agency.	
	• Explicit assessment of the proximity of all proposed development (including solar arrays, substations, pipelines, and grid connections) to flood defences and main rivers, including confirmation of whether any connections pass beneath or intersect with these assets	**ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 2) identifies and maps the relevant tidal and fluvial flood defences associated with the River Welland. The nearest flood defence asset is located within the Order Limits at the western border section of Land Parcel A, which is a drainage ditch associated with the outer Barrier Bank embankment defence of Crowland and Cowbit Washes. This can also be seen within the context	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		of the Scheme layout on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1). With the exception of the drainage ditch along the western border of Land Parcel A, the Scheme's infrastructure is located over 16m of the River Welland and its flood defences in all other locations. Paragraph 5.3.50have been included in the **FRA** (Doc Ref. 6.3 Rev 2) to state the separation distances between the River Welland flood defences and the Order Limits of the Scheme.	
	• Demonstration of how access to defences (for maintenance and operation) will be maintained throughout the lifetime of the development	Following the submission of the Environment Agency's relevant representation, the Applicant has undertaken further engagement with the Environment Agency to confirm access requirements. The following updates have been made to the Application documents at Deadline 1:	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		• **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) have been updated to include a commitment for the provision of an 8m wide access to the Environment Agency's land (drainage ditch) along the western boundary of Parcel A which forms part of the Crowland and Cowbit Washes Flood Storage Reservoir and flood defence; • **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A Outline Landscape Masterplans within the OLEMP** (Doc Ref. 7.16 Rev 1) have been updated to illustrate how the 8m clear zone for access, measured along the length of the Environment Agency's land ownership boundary, could be provided. This access will allow for	

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		Environment Agency's flood risk management, reservoir safety maintenance and other works. With regards to other impacts on access to flood defences, there are no road closures or Heavy Goods Vehicles / Abnormal Indivisible Load routes on local roads that provide direct access to the flood defences (e.g. Wash Bank / Peak Hill / Barrier Bank / Marsh Road), as demonstrated by **ES Figure 15-3** [APP-161], **ES Figure 15-4** [APP-162] and **OCTMP** [APP-278]. With these measures in place, the Scheme is not considered to impact on access to the existing flood defences.	
	• Consideration of residual risks associated with defence failure, including tidal defences and key control structures, such as Fulney Lock and Marsh Road Sluice	The Applicant has considered residual flood risk associated with the flood defence failure of the River Welland (including Fulney Lock and Marsh Road Sluice) through hydraulic modelling	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		undertaken for the River Welland breach assessment. Four breach locations along the Crowland-Cowbit Washes embankment were modelled to determine the flood risk on the proposed infrastructure, with the suitability of these locations confirmed by the EA during a meeting on 25 July 2025. Paragraph 5.3.48, and paragraphs 5.3.51 to 5.3.72 of the **FRA** (Doc Ref. 6.3 Rev 2) provides further details of the breach modelling results, including potential impacts on the Scheme, the proposed mitigation measures and the quantitative assessment of the residual flood risk. The assessment, therefore, adopts a conservative approach to ensure the potential impacts of a flood defence breach are appropriately considered within the flood risk assessment. Paragraph 5.6.13 of the **FRA** (Doc Ref. 6.3 Rev 2) presents the tidal sensitivity	

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		assessment undertaken at Fosdyke Bridge. The modelling demonstrates that peak river levels at the Site are insensitive to changes in the tidal boundary (less than 100mm), and therefore the tidal flood risk influence from the River Welland to the Site is considered low, with fluvial flooding representing the primary source of flood risk to the Scheme.	
	• Clear, consistent plans showing all proposed bunding and flood mitigation measures	**Figure 1-4: Solar Panel Flood Mitigation Design Parameters** located in **ES Appendix 11-3 Annex D** (Doc Ref. 6.3 Rev 2) illustrates the solar panel flood mitigation design parameters across the Site. The figure identifies areas where panels will be installed at a minimum height of 0.8m above ground, as well as areas where panel heights vary between 0.8m and 1.3m above ground, measured from the base of the panel. These ranges are categorised as Band 1 and Band 2 to	**Resolved at Deadline 2.**

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		distinguish between the different panel height requirements. The bands are defined by the hydraulic modelling outputs, based on the maximum (worst-case) flood depth mapping across each assessed catchment and the required freeboard of 0.3m where this is possible to achieve within the maximum height parameter for the solar panels. **Figure 1-5: Solar Station Flood Mitigation Design Parameters** also located in **ES Appendix 11-3 Annex D** (Doc Ref. 6.3 Rev 2) provides clear mapping of the different mitigation requirements for solar stations varying across the Site based on the level of flood risk identified. The Drainage General Arrangement drawing in Annex D of **ES Appendix 11-4: Outline Drainage Strategy** [APP-231] shows the proposed bunding of the On-	

Topic	Matter Raised	Applicant's Response	EA Response
		site substations across the Solar Development Area.	
	• Revision of relevant sections of the ES and FRA to ensure consistency and clarity in the assessment of fluvial and tidal flood risk and the project's interaction with flood defence infrastructure.	Paragraphs 4.3.10 to 4.3.15 of the **FRA** (Doc Ref. 6.3 Rev 2) have been updated to provide more clarity on the tidal flood risk of the Scheme, including more information on the tidal flood defences along the River Welland. The tidal flood risk assessment has also been refined to state that while the tidal flood defence assets along the River Welland substantially reduce tidal flood risk, a residual risk remains associated with the failure of the tidal defence network. Paragraphs 11.6.36 and 11.8.27 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) have been updated to ensure consistency with the tidal flood risk conclusions of the FRA. Both the **FRA** (Doc Ref. 6.3 Rev 2) and **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) have been updated to include more	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		detail on the flood defence infrastructure that surrounds the Scheme.	
EA9 Crowland and Cowbit Washes reservoir	Inadequate recognition of the Crowland and Cowbit Washes as a designated large raised reservoir under the Reservoirs Act 1975. The operation of the Washes and their interaction with fluvial and tidal defences is not clearly represented. Inadequate consideration of key aspects such as proximity of development to the reservoir embankments, required standoff distances, and maintenance/access requirements. Risk of incomplete assessment of fluvial and reservoir flood risk and underestimation of potential flood hazards (eg. flood pathways and residual risks) to the development and surrounding area. Risk that the operation, inspection and maintenance of the reservoir, in accordance with statutory safety requirements, could be compromised.	The Applicant has updated the **FRA** (Doc Ref. 6.3 Rev 2) to include further details of the Crowland and Cowbit Washes large raised reservoir in accordance with the comments received. Detailed responses to the comments received are set out in rows below.	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
	Provide an assessment of the Crowland and Cowbit Washes as a designated large raised reservoir. This should include: • Correct identification of reservoir ownership and classification under the Reservoir Act 1975	Paragraph 4.3.8 of the **FRA** (Doc Ref. 6.3 Rev 2) has been updated to provide a description of the reservoir ownership and classification under the Reservoir Act 1975.	**Resolved at Deadline 2.**
	• A detailed explanation of the operational function of the Washes and their role in managing fluvial flood risk	Paragraph 4.3.8 of the **FRA** (Doc Ref. 6.3 Rev 2) has also been expanded to provide details of the operational function of the Crowland-Cowbit Washes and their role in managing fluvial flood risk, using information from the Lower Welland – Fens 2100+ flood risk baseline report[2].	**Resolved at Deadline 2.**
	• A full assessment of reservoir flood risk, including breach and overtopping scenarios, ensuring consistency across all	The Applicant has considered residual flood risk associated with the failure of the Crowland-Cowbit Washes embankments, for a breach scenario,	**Resolved at Deadline 2.**

[2] Arup (2025) Lower Welland: Flood Risk Baseline 2025. Available at: https://assets.publishing.service.gov.uk/media/69caa888b111d64c49bb3da4/Fens_2100+_Lower_Welland_-_Flood_Risk_Baseline.pdf [Accessed 23/07/2026]

Topic	Matter Raised	Applicant's Response	EA Response
	documents and resolution of any contradictory statements	through hydraulic modelling undertaken for the River Welland. Four breach locations along the Crowland-Cowbit Washes embankment were modelled to determine the flood risk on the proposed infrastructure, with the suitability of these locations confirmed by the EA during a meeting on 25 July 2025. The assessment adopts a conservative approach by assuming a failure of the flood defences under extreme flood conditions to ensure the potential impacts of this flood risk on the proposed infrastructure is fully assessed. Paragraph 5.3.44 to 48, and paragraphs 5.3.51 to 5.3.72 the **FRA** (Doc Ref. 6.3 Rev 2) provides further details of the breach modelling results, including potential impacts on the Scheme, the proposed mitigation measures and the quantitative assessment of the residual flood risk. The assessment, therefore, adopts a conservative approach to ensure the potential impacts of a flood defence	

Topic	Matter Raised	Applicant's Response	EA Response
		breach caused by the breach of the embankments of Crowland-Cowbit Washes are appropriately considered within the **FRA** (Doc Ref. 6.3 Rev 2). The hydraulic modelling also considers the defended scenario for the 0.1% AEP plus 28% climate change event. The modelling demonstrates that floodwater fills up the Crowland-Cowbit Washes between the inner and outer bank defences but does not overtop the Outer Bank of the Washes for the 0.1% AEP plus 28% climate change event, confirming there would be no overtopping for an extreme event. This is discussed in paragraphs 5.3.9 and 5.3.10 in the **FRA** (Doc Ref. 6.3 Rev 2).	
	• Clear mapping of the proximity of all development to the reservoir embankments, with defined standoff distances	**ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 2) includes mapping of the proximity of the Order Limits to the Crowland-Cowbit Washes as well as	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		other nearby existing flood defences. The Applicant has undertaken further engagement with the Environment Agency which has confirmed that the Environment Agency's land within the western part of Parcel A forms part of the Cowbit to Crowland Washes Flood Storage Reservoir (a drainage ditch associated with the embankment). This can also be seen within the context of the Scheme layout on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1). As requested by the Environment Agency, the Applicant has excluded compulsory acquisition rights for this area of land and incorporated an 8m buffer to provide access. These measures have been secured through the updated the **Land Plan and Crown Plans – Solar Development Area** (Doc Ref. 2.4 Rev 2), **OLEMP** (Doc Ref. 7.16 Rev 1), **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP**	

Topic	Matter Raised	Applicant's Response	EA Response
		(Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) submitted at Deadline 1.	
	• Demonstration of how safe and unobstructed access to reservoir banks will be maintained for inspection, maintenance, and emergency response throughout the development lifetime.	As set out above, following the submission of the Environment Agency's relevant representation, the Applicant has undertaken further engagement with the Environment Agency to confirm access requirements. The following updates have been made to the Application documents at Deadline 1: • **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) have been updated to include a commitment for the provision of an 8m wide access to the Environment Agency's land (drainage ditch) along the western boundary of Parcel A which forms part of the Crowland and Cowbit	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		Washes Flood Storage Reservoir and flood defence; **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A Outline Landscape Masterplans within the OLEMP** (Doc Ref. 7.16 Rev 1) have been updated to illustrate how the 8m clear zone for access measured along the length of the Environment Agency's land ownership boundary, could be provided. This access will allow for Environment Agency's flood risk management, reservoir safety maintenance and other works.	
	• Consideration of appropriate boundary treatments (e.g. fencing, landscaping) to avoid creating habitats for burrowing animals or introducing other risks to embankment stability.	The Crowland and Cowbit Washes Flood Storage Reservoir embankment/ flood defence is separated from the Scheme by a drainage ditch, an 8m buffer, and a landscaped boundary comprised of scattered trees and shrubs and fencing, as illustrated on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A: Outline**	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		Landscape Masterplans of the OLEMP (Doc Ref. 7.16 Rev 1). The boundary treatment in this form is not considered to provide primary habitat for burrowing animals, such as badger, or introduce other risks to embankment stability.	
EA10 Tidal flood risk	There is inadequate understanding of tidal flood risk. The River Welland is tidal from the Wash to Spalding, with significant defences along the Wash frontage and along the tidal reach from Fosdyke to Marsh Road Sluice and Fulney Lock. However, these defences and their role in managing tidal flood risk are not adequately reflected within the FRA. Inconsistencies are present within the ES: paragraph 11.6.37 refers to tidal risk from the River Nene and the Wash Frontage without clearly identifying the modelling basis, while paragraph 11.6.64 incorrectly states that the Grid Connection Route is not at risk of tidal flooding, despite its	The Applicant has revised the **FRA** (Doc Ref. 6.3 Rev 2) to provide additional assessment of the Environment Agency (EA) flood defence assets located near the Scheme and the tidal flood risk to the Grid Connection Route. **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has also been updated accordingly. Detailed responses to the comments raised are provided in rows below.	**Resolved at Deadline 2.** The additional information and clarification provided by the Applicant is accepted.

Topic	Matter Raised	Applicant's Response	EA Response
	reliance on defended conditions along the River Welland. Risk of underestimation of flood risk across the site and inappropriate siting of infrastructure in areas that may be vulnerable during extreme events. Potential risk for the safety and resilience of the proposed development and non-compliance with national planning policy and flood risk guidance.		
	The FRA and ES should be updated to provide a comprehensive and consistent assessment of tidal flood risk. This should include: • A clear description of the tidal nature of the River Welland and the role of defences from the Wash to Spalding (including Fosdyke, Fulney Lock, and Marsh Road Sluice)	Paragraph 4.3.5 of the **FRA** (Doc Ref. 6.3 Rev 2) has been expanded, and paragraphs 4.3.6 to 4.3.9 included to provide additional information on the functional role of the flood defences along the River Welland in managing tidal and fluvial flood risk. These flood defences include Fulney Lock, Marsh Road Sluice and the Crowland and Cowbit Washes. Information on the condition and Standard of Protection (SoP) of the relevant EA flood defence	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		assets has also been incorporated into this section of the revised **FRA** (Doc Ref. 6.3 Rev 2), using data obtained from the EA's Spatial Flood defences database.	
	• Greater clarity regarding the interaction between tidal sources (Wash frontage, River Welland, and River Nene) and the extent to which defences reduce flood risk.	Paragraph 4.3.5 of the revised **FRA** (Doc Ref. 6.3 Rev 2) has been expanded to provide additional information on the functional role of the flood defence Fulney Lock along the River Welland in managing tidal and fluvial flood risk. Additional information has been provided for this flood defence in its role in protecting Spalding from coastal flooding associated with high tides and storm surge events. Paragraph 4.3.6 of the FRA provides detail on how Marsh Road Sluice controls tidal water levels for the River Welland. Paragraph 4.3.7 to 4.3.9 of the FRA provides additional detail on the tidal flood defences between Fulney	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		Lock/Marsh Road Sluice and Fosdyke, as well as how tidal flood risk is managed by coastal flood defences along the Wash Frontage to reduce flood risk. Paragraph 4.3.11 has also been expanded to include details on the tidal flood defences along the River Nene, and how these flood defences reduce flood risk to the surrounding area. **ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 2) identifies and maps the relevant tidal and fluvial flood defences associated with the River Welland and near the Wash, providing detail on the type of flood defences that are present along the River Welland and the Wash.	
	• Explicit identification of all modelling used, including defended and undefended scenarios	Paragraph 5.3.5 onwards of the revised **FRA** (Doc Ref. 6.3 Rev 2) provides a summary of the hydraulic models that were used to inform the flood risk	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		assessment. The Applicant has undertaken detailed modelling for the River Welland, the South Holland Main Drain and reviewed the existing hydraulic model for the Postland Pumped Catchment. The Applicant has also reviewed the hydraulic model report and flood extents for the River Nene, with all models accounting for current climate change allowances. Table 5-8 of the revised **FRA** (Doc Ref. 6.3 Rev 2) also provides a summary of hydraulic models and results for the Solar Development Area, setting out the worst-case model extent scenario, embedded mitigation, impact on-site and off-site with the Scheme for each hydraulic model. Paragraph 5.6.13 provides an explanation of the tidal boundary conditions at Fosdyke Bridge used in the hydraulic modelling of the River Welland, including	

Topic	Matter Raised	Applicant's Response	EA Response
		the conservative 1.1m climate change allowance, and demonstrates that the peak river levels at the Site are largely insensitive to changes in the tidal boundary. It therefore concludes that tidal flood risk from the River Welland is considered minimal, with fluvial flooding representing the primary source of flood risk. The River Nene was also assessed to inform the flood risk to the Scheme. Modelling was undertaken by the EA in 2011 for a range of scenarios to assess flood hazards, depths and velocities for each breach event, and overtopping with no breach (see Plate 5-14 within the **FRA** (Doc Ref. 6.3 Rev 2)). Results of overtopping using the updated 2016 hydraulic model from the EA show that the flood extent of the River Nene would not extend out into the flood channel far enough to impact the Scheme.	

Topic	Matter Raised	Applicant's Response	EA Response
	• Assessment of residual risk associated with defence overtopping and breach, and how this influences site layout and design	Paragraph 5.3.128 of the revised **FRA** (Doc Ref. 6.3 Rev 2) concludes that the Scheme is not at risk of tidal flooding, or from a breach or overtopping of the River Nene Defences in Wisbech, taking into account current climate change allowances and agreed worst case modelled scenarios. The Applicant has considered residual flood risk associated with the flood defence failure of the River Welland through hydraulic modelling undertaken for the River Welland breach assessment. Four breach locations along the Crowland-Cowbit Washes embankment were modelled to determine the flood risk on the Proposed Infrastructure, with the suitability of these locations confirmed by the EA during a meeting on 25 July 2025. Paragraph 5.3.44 48, and paragraphs 5.3.51 to 5.3.72 of the revised **FRA** (Doc Ref. 6.3 Rev 2) provides further details of	

Topic	Matter Raised	Applicant's Response	EA Response
		the breach modelling results, including potential impacts on the Scheme, the proposed mitigation measures and the quantitative assessment of the residual flood risk. The assessment therefore adopts a conservative approach to ensure the potential impacts of a flood defence breach are appropriately considered within the flood risk assessment. Paragraph 5.6.13 concludes that tidal flood risk from the River Welland is considered minimal, with fluvial flooding representing the primary source of flood risk.	
	• Correction of inaccurate statements (e.g. confirming that the Grid Connection Route may be at tidal flood risk under undefended or extreme conditions).	Paragraph 11.6.36 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated to include a description of the tidal flood defences along the River Welland and to state the tidal flood risk of the Scheme is reduced by the presence of these flood defences,	**Resolved at Deadline 2.**

Topic	Matter Raised	Applicant's Response	EA Response
		and there is a low residual tidal risk from the River Welland if the lock or flood defences were to fail or overtop. The **FRA** (Doc Ref. 6.3 Rev 2) has also been updated to reflect this.	
EA11 Climate change allowances	Inconsistent approach to sensitivity testing for climate change. The H++ sea level rise scenario has been correctly used as a sensitivity test in accordance with guidance to consider a credible maximum scenario. However there is no equivalent assessment of a credible maximum scenario for peak river flows . Risk of underestimation of future fluvial flood risk (eg.flood extents, depths and hazard) under more extreme climate change conditions . This may influence the site layout, mitigation measures and the scheme's overall resilience to flooding. Update the FRA with a consistent approach to climate change allowances across tidal and fluvial sources of flood risk. A credible	The Applicant confirms the EA agreed, during pre-application engagement, that the breach assessment for the River Welland should be undertaken using the 0.1% Annual Exceedance Probability (AEP) event with the Higher Central climate change allowance (28%) for the maximum flood event; effectively the Credible Maximum Scenario event. In addition, the **FRA** (Doc Ref. 6.3 Rev 2) considers the 0.1% AEP event plus climate change for the South Holland Main Drain and Postland Catchment. In light of this requirement for the River Welland, and to ensure consistency in the assessment methodology, the Applicant	**Update at Deadline 2: On-going.** We acknowledge the Applicant's explanation of the flood scenarios selected as the 'credible maximum' events. However, further justification is required to demonstrate why the chosen return interval and climate change scenarios for each catchment represent a suitably conservative approach to assessing the 'credible maximum', particularly where they differ from the methodology set out in the Government guidance, *Flood Risk*

Topic	Matter Raised	Applicant's Response	EA Response
	maximum scenario for peak river flows should be assessed using the upper end climate change allowance. The assessment should be used as a sensitivity test to inform the sequential approach, site layout, and mitigation strategy, ensuring that the development is resilient to a wide range of plausible future conditions.	considered it appropriate to apply the Higher Central climate change allowance to the South Holland Main Drain and the Postland Catchment assessments. This approach is consistent with the methodology agreed with the EA for the River Welland assessment. The Applicant considers that the adoption of the Higher Central climate change allowance across all hydraulic models provides a robust and proportionate basis for assessing the maximum credible scenario for flood risk to the Scheme. The assessment therefore adopts a conservative approach, ensuring that the potential impacts of peak river flows are considered using consistent assumptions across the principal flood sources relevant to the Scheme.	*Assessment: Climate Change Allowances*. **Update at Deadline 3: Resolved**
EA12 Developmen	The proposal includes development within Flood Zone 3b (functional floodplain),	Paragraph 6.3.5 of the **FRA** (Doc Ref 6.3 Rev 2) has been updated to more clearly	**Update at Deadline 2: Unresolved.**

Topic	Matter Raised	Applicant's Response	EA Response
t in flood zone 3b	which is contrary to national policy as set out in EN-1 National Policy Statement (NPS) paragraph 5.8.4. This policy states that energy projects should not normally be consented within Flood Zone 3b unless there are overriding operational reasons, and only where it can be demonstrated that the development will not result in a net loss of floodplain storage or impede flood flows. The primary mitigation proposed is the provision of a 600mm freeboard. This approach does not fully address the requirement to preserve floodplain storage and ensure flood flow routes are maintained. Risks of reduced flood storage and obstruction of natural flood flows. This can increase flood risk elsewhere, alter flow paths, and exacerbate flood depths and velocities during flood events. The reliance on the 600mm freeboard alone does not mitigate these and may result in non-compliance with national planning policy.	set out why Flood Zone 3b cannot be avoided in the Gotts catchment. In summary, it has not possible to locate proposed infrastructure outside of Flood Zone 3b without either acquiring additional land (noting surrounding land north of South Holland Main Drain is also within Flood Zone 3b) or removing these land parcels from the Solar Development Area altogether, which would reduce the generating capacity of the Scheme. The **FRA** (Doc Ref 6.3 Rev 2) also explains that there are no clear overland flow paths, reflective of the flat topography, with accordingly low velocities. Solar stations and solar PV panels will not impede floodplain function or create blockage risks or obtain damage from such low flows. The **FRA** (Doc Ref 6.3 Rev 2) also provides an assessment of the impact on floodplain storage,	Following the EA/Applicant meeting on 16 September 2026, the Applicant agreed to undertake additional assessment of flow conveyance routes within Flood Zone 3b. This work should demonstrate that the proposed solar panel support structures within Flood Zone 3b will not adversely affect flood flow routes. **Update at Deadline 3: On-going** A 2D hydraulic model has now been developed by the Applicant to provide a more detailed assessment of floodplain flow behaviour. The assessment undertaken to date indicates that the solar stations proposed within Flood Zone 3b would not

Topic	Matter Raised	Applicant's Response	EA Response
	The FRA should be revised to demonstrate full compliance with national policy. This should include: • A clear justification for why infrastructure must be located within the functional floodplain, including any operational constraints	demonstrating an overall non-material change in flood risk. The assessment is considered to satisfy Paragraph 5.8.12 of NPS EN-1[3].	have an adverse impact on flood flow routes. The issue of development within Flood Zone 3b was previously raised in relation to the proposed solar stations within Flood Zone 3b. However, following review of REP2-018 Post ISH1 Sequential and Exception Tests and REP2-005 Outline Construction Environmental Management Plan, Appendix A – Outline Flood Emergency Response Plan submitted at Deadline 2, it has come to our attention that 2 construction compounds are also proposed within Flood Zone 3b associated with the Gotts Catchment.

[3] DESNZ (2025) Overarching National Policy Statement for Energy (EN-1) Available at: https://assets.publishing.service.gov.uk/media/695d1015f41883f4e50ed9ab/overarching-national-policy-statement-for-energy-en-1-web-accessible.pdf [Accessed 23/07/2026]

Topic	Matter Raised	Applicant's Response	EA Response
			Whilst these compounds are expected to be temporary and present only during the construction phase, the applicant should demonstrate why alternative locations at lower risk of flooding are not reasonably available. Furthermore, the proposed location of these compounds within Flood Zone 3b has not been adequately addressed within the submitted documentation. There is currently very limited consideration of the potential flood risk implications arising from their siting in the functional floodplain, and this should be addressed comprehensively within the application documents. The assessment should clearly explain the

Topic	Matter Raised	Applicant's Response	EA Response
			justification for their location and the potential impacts on flood risk and flow routes within floodplain function.
	• Quantitative assessment of floodplain storage loss and demonstration of how this will be avoided or fully compensated (e.g. through level-for-level, volume-for-volume compensatory storage)	The solar panel mounting infrastructure and six proposed solar stations within the Flood Zone 3b extents of the South Holland Main Drain, in the Gotts catchment, result in a localised increase in flood depth within Flood Zone 3b of less than 1 mm. The increase is limited in spatial extent and occurs entirely within the functional floodplain, where floodplain storage and conveyance continue to be maintained. The Applicant considers that an increase in flood depth of this magnitude is not hydraulically material.	
	• Hydraulic assessment to demonstrate that the development will not impede flood flows or increase flood risk elsewhere	The Applicant considers that post-Scheme increase in flood depth of this magnitude is not hydraulically material.	

Topic	Matter Raised	Applicant's Response	EA Response
		The predicted change is substantially smaller than the uncertainties inherent within two-dimensional hydraulic modelling, including those associated with terrain data, roughness parameters and calibration. Furthermore, the change does not result in a discernible alteration to flood extents, flow routes, flood hazard classification or the overall function of the floodplain. This increase is non-significant and will not materially increase flood risk elsewhere. The assessment of surface water risk and flow paths within paragraph 5.3.90 and Plate 5-7 of the revised **FRA** (Doc Ref 6.3 Rev 2) conclude velocities across the Gotts catchment, where infrastructure sits in Flood Zone 3b, are low (less than 0.25m/s). With the flat nature of the land parcel, it is reasonable to conclude flow velocities from inundation from the South Holland Main Drain will also be low. The	

Topic	Matter Raised	Applicant's Response	EA Response
		PV panels and solar stations are set well back from the bank of the watercourse, in areas where velocities would reasonably be lower, therefore, not impeding or impacting floodplain function. The overall post-Scheme flood depth assessment was carried out and discussed in paragraphs starting from 5.3.60 in the **FRA** (Doc Ref 6.3 Rev 2). The review of site levels confirms no impact to high risk receptors, a maximum depth increase of up to 0.1m is retained within one agricultural field which already floods during a breach event. No other locations showing a depth increase are near to a high risk receptor, i.e. the areas are located in field areas and woodland areas. Therefore, there is no material increase in flood risk to properties or roads as a result of the River Welland breach scenario catchment, or from	

Topic	Matter Raised	Applicant's Response	EA Response
		infrastructure within the Flood Zone 3b and 3a within the Gotts Catchment.	
	• Consideration of alternative site layouts to avoid Flood Zone 3b wherever possible, in line with the sequential approach, with clear evidence of this provided within the FRA Additional While freeboard can provide a degree of resilience to flooding for information specific assets, it does not address the wider functional role of Flood Zone 3b as active floodplain. National policy places strict controls on development in these areas due to their importance in storing and conveying floodwaters.	Section 6 of the **FRA** (Doc Ref 6.3 Rev 2) describes the Site selection process for the Scheme. Hydraulic modelling of the River Welland, Postland Pumped Catchment and South Holland Main Drain has informed the layout of the Scheme, with critical infrastructure located outside of Flood Zone 3b extent wherever feasible. Within the Postland Pumped Catchment, all infrastructure has been located outside of the Flood Zone 3b flood extents, other than some of the Solar PV panels. Solar stations and substations located within this catchment area are designed with mitigation that accounts for the River Welland breach scenario, ensuring flood risk to the Scheme is appropriately managed.	

Topic	Matter Raised	Applicant's Response	EA Response
		Other than 6 solar stations in the Gotts Catchment, all solar stations have also been located outside of Flood Zone 3b flood extents in the South Holland Main Drain Catchment. It has not been possible to locate the 6 solar stations outside of the Flood Zone 3b extent of the Gotts Catchment without either acquiring additional land (noting surrounding land is also within Flood Zone 3b) or removing these land parcels from the Solar Development Area altogether, which would reduce the generating capacity and viability of the Scheme. Paragraph 6.3.5 in the **FRA** (Doc Ref. 6.3 Rev 2) states that solar stations must be located close to the solar PV panels. Within Land Parcels D-1-02, D-1-02, and D-1-03 of the Gotts catchment, almost all available land lies within Flood Zone 3b. The flood extent of land outside of Flood Zone 3b within the Gotts catchment is limited in both size and configuration and is insufficient to	

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		accommodate a solar station within a practical distance to the solar PV panels. Solar stations are required to serve defined areas of solar arrays and therefore need to be positioned centrally within their respective electrical catchments to minimise underground cable lengths, reduce electrical losses, maintain acceptable voltage drop and optimise operational efficiency. Relocating these solar stations outside Flood Zone 3b may result in longer cable routes, increased trenching, additional watercourse crossings and greater construction impacts. Such changes would introduce additional environmental effects and reduce the overall efficiency and deliverability of the Scheme. The layout of the Scheme has been partly informed by the results of the hydraulic modelling undertaken which has identified areas of higher flood risk and	

Topic	Matter Raised	Applicant's Response	EA Response
		informed the positioning of critical infrastructure to avoid Flood Zone 3b where practicable. The design approach discussed above is captured within Principle 7 of the **Design Approach Document** [APP-268] within paragraph 7.1.8.	
EA13 Exception Test	Failure to properly apply and evidence the Exception Test. There is no clear evidence to show that attempts have been made to explore an overall reduction in flood risk, as required by the Exception Test wherever possible. Risk that the development is not compliant with policy. The FRA should be updated to provide a robust and policy- compliant application of the Exception Test. This should include: • Evidence demonstrating the exploration of options to reduce flood risk overall, such as improved floodplain function. Where it is	During previous pre-application engagement with the EA, and following a meeting in July 2026, the Applicant understood that development within the Gotts catchment may be capable of being justified where the requirements of the Exception Test are satisfied, demonstrating that the infrastructure cannot reasonably be located elsewhere, 600mm freeboard is provided for solar stations, floodplain function would not be impeded and overland flow velocities would not damage or cause debris blockage.	**Update at Deadline 2: Unresolved.** The Applicant has not yet provided sufficient evidence to demonstrate that opportunities to reduce flood risk have been explored, as required by the Exception Test. The FRA should be updated to include:

Topic	Matter Raised	Applicant's Response	EA Response
	not possible for flood risk betterment to be achieved, the reasons for this must be clearly set out within the FRA	The design process has sought to avoid and minimise impacts on flood risk through the layout and incorporation of flood mitigation measures, where reasonably practicable. Opportunities to provide additional floodplain compensation or further reduce flood impacts have been fully explored. However, owing to the physical constraints of the Site and the surrounding floodplain, no additional practicable measures are available that would deliver a measurable reduction in flood depths across the floodplain without giving rise to disproportionate engineering intervention or consequential environmental effects. The Applicant, therefore, considers that the residual increase represents a negligible hydraulic effect that, as concluded in the **FRA** (Doc Ref 6.3 Rev 2), does not materially increase flood risk or	• Evidence that flood risk reduction opportunities were considered; • Assessment of potential measures and their feasibility; and • Justification where opportunities were discounted. Applicant response focuses on mitigating flood risk impacts on the development itself but does not demonstrate that wider opportunities for flood risk betterment were explored within the affected catchments. Additional evidence and supporting narrative within the FRA are required to satisfy this element of the Exception Test.

Topic	Matter Raised	Applicant's Response	EA Response
		adversely affect the operation or function of the functional floodplain. In the context of the overall assessment, the residual effect is considered to be acceptable and proportionate. Section 5.10 of the **Planning Statement** [APP-260] summarises the application of the Sequential and Exception Tests. There are two limbs to the Exception Test within paragraph 031 of the PPG. In response to the first limb which requires demonstrating the Scheme would provide wider sustainability benefits that outweigh flood risk, the Scheme would contribute to the UK's net zero and energy security goals at a national level as described in Section 4 of the **Planning Statement** [APP-260]. The second limb requires that essential infrastructure located in Flood Zone 3a be designed and constructed to remain operational and safe in times of flood.	**Update at Deadline 3: On-going** Concerns remain regarding the proposed construction compounds within Flood Zone 3b. It should be demonstrated why the compounds could not be located within areas of lower flood risk. Further assessment is needed to demonstrate that they will not obstruct flood flow routes or adversely affect floodplain function. For the Exception Test, the applicant states that opportunities to reduce flood risk have been explored, but further evidence should be provided to demonstrate what alternatives were considered and why no additional flood risk reductions were achievable.

Topic	Matter Raised	Applicant's Response	EA Response
		Where infrastructure is located within Flood Zone 3b (the functional floodplain), it must also result in no net loss of floodplain storage, not impede water flows and not increase flood risk elsewhere. Within Land Parcels A, B and C, all infrastructure other than the solar PV panels are to be located outside of the Flood Zone 3b extents, with embedded mitigation included in the design to take into account a breach scenario of the River Welland. Within Land Parcel D, there are six solar stations proposed within Flood Zone 3b associated with the Gotts Catchment. These solar stations have a functional requirement to be co-located with the solar PV panels planned within these fields. There are no alternative design scenarios in this location which would see the solar stations located outside of	

Topic	Matter Raised	Applicant's Response	EA Response
		the functional floodplain without removal of the solar PV panels altogether, thereby materially reducing the generating capacity of the Scheme. **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3 Rev 2) concludes the siting of the Scheme infrastructure in the flood zone is not expected to result in any material or measurable loss of floodplain storage, nor any material change to flood depths or floodplain hydraulics. On this basis, no additional flood mitigation or compensation is required. Taking into account the above, it is considered the Scheme meets the second limb of the Exception Test as the embedded design measures demonstrate development will be safe for its lifetime taking account the vulnerability of its users, without materially increasing flood risk elsewhere.	

Topic	Matter Raised	Applicant's Response	EA Response
EA14 Impact of flood bunding	A considerable amount of bunding is proposed around infrastructure located within the floodplain. The extent, layout, and function of these bunded areas are not clearly defined making it difficult to assess any cumulative impact. Limited consideration has been given regarding whether compensatory storage or greater flood storage provision would be appropriate given the scale and number of bunded areas. Maintenance requirements and long-term performance of the bunds are not addressed. Risk of cumulative impacts creating an increase flood risk elsewhere (or exacerbate localised drainage complexities) through the displacement of floodwater and alteration of flow paths. Without clear maintenance arrangements, the long-term effectiveness of the bunds cannot be assured, potentially leading to increased risk over the development lifetime.	Paragraphs 5.3.26, 5.3.52 to 5.3.59, Table 5-5, Table 5-8 and Section 8 of the revised **FRA** (Doc Ref. 6.3 Rev 2) identify where bunding or a flood defence wall would be required to protect the Scheme's infrastructure, the worst-case flood event against which the flood protection requirements have been assessed, and the associated freeboard allowances. The assessment considers the River Welland breach scenario and Postland catchment (both 0.1% AEP + 28% climate change) and the South Holland Main Drain 0.1% AEP + 13% climate change pump failure scenario, as agreed with the EA on the 25 July 2025 as the worst-case scenarios. Bunding (or a flood defence wall) is proposed for On-Site Substations in Parcels A, B and C, BESS compound, selected solar stations and CSEC South to manage residual flood risk associated with the assessed flood events.	**Resolved at Deadline 2** The Applicant's response is accepted and will wait for detailed bund design to be provided at a later stage.

Topic	Matter Raised	Applicant's Response	EA Response
	The FRA should be updated to provide a clearer and more comprehensive assessment of bunding proposals. This should include: • A quantified and mapped extent of all proposed infrastructure, clearly shown on plans (including solar stations, substations, and associated infrastructure)	Paragraph 5.3.55 of the revised **FRA** (Doc Ref. 6.3 Rev 2) and Figure 1-5 in **ES Appendix 11-3: Flood Risk Assessment - Annex D** (Doc Ref. 6.3 Rev 2) identify the locations where bunding or a flood defence wall is required for solar stations, whilst paragraph 5.3.57 identifies the On-Site Substations located within the River Welland breach flood extent that will require bunding or a flood defence wall. It is noted that the locations of solar stations within Work No 1 area are not fixed, as such Figure 1-5 in **Annex D** (Doc Ref. 6.3 Rev 2) indicates areas where bunding or a flood defence wall would be required, if a solar station was to be placed in these areas. Paragraph 5.3.58 sets out the approach used to determine the required bund or flood defence wall heights, including the provision of 300 mm freeboard. For the River Welland, the bunding requirements	

Topic	Matter Raised	Applicant's Response	EA Response
		relate to the residual risk associated with the 0.1% AEP plus 28% climate change River Welland breach scenario, as agreed with the EA. The River Welland breach model flood extent and depths exceed the equivalent values of the 0.1% AEP plus 28% of the Postland model in Land Parcels A, B and C. For Land Parcel D, bunding requirements have been assessed against the South Holland Main Drain 0.1% AEP plus 13% climate change pump failure event. As such, the required bund or flood defence wall height is calculated at detailed design by combining the ground level at the infrastructure location from the topographical survey, the maximum flood depth at that location and the required freeboard. This is set out and secured through the **Design Parameters** (Doc Ref. 7.4 Rev 2).	

Topic	Matter Raised	Applicant's Response	EA Response
	• An assessment of the cumulative impact of bunding on floodplain storage and flow conveyance, including consideration of whether compensatory storage or enhanced flood storage provision is required, even in defended or breach scenarios	Hydraulic modelling completed for the Scheme considered bunding around the On-Site Substations and all Solar Stations for a worst-case assessment (see modelling assumptions in **FRA Annex B** [APP-224]), using the maximum bund width. As such, the depth change volume assessment reported in the **FRA** (Doc Ref. 6.3 Rev 2) accounts for the possible worst-case bunding, whilst in practice some of the Solar Stations can also be raised on plinths instead. The flood depth change assessment demonstrates that the change is minimal and results in no significant effects. The **FRA** (Doc Ref. 6.3 Rev 2) has been updated to provide additional discussion on the assessment of impacts on flood risk from the proposed bunds.	
	• Detailed design information for bunds, including crest levels, relationship to design flood levels, and freeboard	Detailed design information of the bunds, including the height of bunds, opportunities to optimise bunding,	

Topic	Matter Raised	Applicant's Response	EA Response
	allowances, clarifying whether infrastructure is raised above flood levels or relies on bund protection • Consideration of opportunities to optimise bunding and freeboard requirements, potentially reducing the extent of earthworks through design refinement • A clear maintenance and inspection strategy to ensure that bunds remain effective throughout the development lifetime	inspection requirements and long-term maintenance arrangements, will be developed during the detailed design stage post-DCO consent. The commitment for inspection requirements and long-term maintenance arrangements to be set out has been included within the **OOEMP** (Doc Ref. 7.11 Rev 1) at Deadline 1.	
	• Integration of these considerations into the wider FRA narrative, ensuring consistency with modelling outputs and the requirements of the Exception Test. Additional We acknowledge that floodplain compensation is not typically information required behind defences or within breach extents, however the scale and number of bunded areas proposed warrant further	The **FRA** (Doc Ref. 6.3 Rev 2) has been updated to provide additional discussion on the assessment of impacts on flood risk from the proposed bunds, as set out in rows above. It is also noted that the solar stations within Flood Zone 3b of Gotts catchment would be raised on plinths rather than require bunding.	

Topic	Matter Raised	Applicant's Response	EA Response
	consideration of their cumulative effect. Although some of these aspects appear to have been considered within the modelling, they are not fully discussed within the FRA.		
Hydraulic Modelling			
EA15 Lack of clarity regarding volume loss calculations	Design event used for volume loss calculations is unclear Lack of clarity regarding flood risk impacts Provide clarity in Table 5-2 regarding which scenario has been used to determine the volume loss and depth increase calculations, for example, breach, defended, pump failure etc along with which annual exceedance probability scenario has been used. It is not clear which scenario the calculations in this table reflect. For example, is this a breach scenario (residual flood risk) on the River Welland for the 0.1% plus 28% climate change scenario	Table 5-2 of the **FRA** (Doc Ref 6.3 Rev 2) has been updated to clarify the modelled event used in the volume loss calculations to confirm the Welland breach scenario has been used in the assessment, and the South Holland Main Drain and Postland models. The South Holland Main Drain and Postland models have no defences, so comprise undefended model scenarios. Additionally, Table 5-8 has been included within the **FRA** (Doc Ref 6.3 Rev 2) which summarises the detailed hydraulic modelling undertaken for each watercourse and sets out the worst case impacts of each hydraulic model scenario	**Resolved at Deadline 2** **The applicants response is accepted**. The updated Flood Risk Assessment includes details of the specific design event scenarios used for the volume loss calculations and bund heights

Topic	Matter Raised	Applicant's Response	EA Response
	and defended scenario for the Postland Catchment and South Holland Main Drain or pump failure scenarios. This should be made explicitly clear in the table	for the River Welland, Postland and South Holland Main Drain catchments, on the Solar Development Area Land Parcels, alongside the mitigation requirements to ensure infrastructure will remain operational in times of flood. Furthermore, paragraph 5.3.7 of the revised **FRA** (Doc Ref 6.3 Rev 2) includes a summary of the modelling parameters, that has informed the detailed assessment of flood risk and floodplain compensation assessment. Plate 5-2 in the revised **FRA** (Doc Ref 6.3 Rev 2) indicates the fluvial catchment areas that have been modelled.	
EA16 Flood defence standard of protection	Conflicting information with respect to flood defence standard of protection Lack of clarity regarding standard of protection for the River Welland defences Please ensure that standard of protection (SOP) is consistently reported as different	The **FRA** (Doc Ref 6.3 Rev 2) has been reviewed and updated to ensure that the level of protection provided by the River Welland flood defences is described consistently throughout the report.	**Resolved at Deadline 2** **The applicants response is accepted**. The updated Flood Risk Assessment includes details of the specific design event scenarios used for the volume

Topic	Matter Raised	Applicant's Response	EA Response
	SOPs are reported for the Welland in different paragraphs of the FRA which is confusing to the reader Whilst it is appreciated that there are varying standards of protection along the Welland the information presented requires clarification. For example, paragraph 5.4.18 states that the proposed solar PV modules benefit from existing flood defences along the River Welland which defend against a 1% AEP plus 28% climate change event. Paragraph 5.4.20 then goes onto state that the flood defences only provide protection up to a 1 in 100-year event.		loss calculations and bund heights
EA17 Bund wall heights	Design event scenario for bund wall heights in table 5-4 is not clear Mitigation could be inappropriate Please make it explicitly clear in table 5-4 and paragraph 5.4.29 which scenario has been used to inform the bund wall heights	Tabel 5-4, which is now Table 5-5 in the revised **FRA** (Doc Ref 6.3 Rev 2), has been updated to clarify that the modelled event used to calculate the required bund or flood defence wall heights for the On-Site Substations and BESS Compound is the	**Resolved at Deadline 2** **The applicants response is accepted**. The updated Flood Risk Assessment includes details of the specific design event scenarios used for the volume loss calculations and bund heights

Topic	Matter Raised	Applicant's Response	EA Response
	This paragraph suggests the proposed bund or wall heights include a 0.3m freeboard. It is not clear what modelled flood scenario has been used to inform the heights, for example is this a River Welland Breach for the 0.1% (1 in 1000) annual exceedance probability scenario plus 28% climate change? This should be made explicitly clear in the text.	breach scenario of the River Welland, for the 0.1% AEP plus 28% CC event. Paragraph 5.4.29 is now paragraph 5.3.58 in the revised **FRA** (Doc Ref 6.3 Rev 2), and has also been updated to clarify the modelled scenario that the calculations are based upon (as above). Additionally, within the revised **FRA** (Doc Ref 6.3 Rev 2), Table 5-8 has been included, that summarises the detailed hydraulic modelling undertaken for each watercourse, and sets out the worst case impacts of each model on the Solar Development Area Land Parcels, alongside the mitigation requirements to ensure infrastructure will remain operational in times of flood.	
EA18 Assessment of volume losses for	It is not clear whether solar PV support panels are included in the assessment of volume losses for the Gotts Catchment	The Applicant confirms the Scheme has assessed solar PV panel leg impacts across all four Land Parcels in the Solar Development Area.	**Resolved at Deadline 2** **The applicants response is accepted**. Futher detail provided to clarify that the solar panel

Topic	Matter Raised	Applicant's Response	EA Response
the Gotts Catchment	Flood risk impacts could be underestimated Please assess the panel leg volume losses for solar PV panels in Flood Zone 3b as shown in plate 5-5 This section notes that each solar station has a footprint of approximately 56m2 resulting in a combined total base area of 336m2 for the six solar stations. The map in plate 5.5 shows solar stations in Flood Zone 3b. The pink outline shows the extent of Flood Zone 3b and the blue polygons are presumably the solar panel areas. In addition to the solar stations the area of solar panels (blue polygons) which intersect Flood Zone 3b as shown in plate 5.5 is around 250,000 m2. The applicant should also assess the panel leg volume lost within Flood Zone 3b in this location and demonstrate how the development is compliant with paragraph 5.8.12 within the Overarching National Policy Statement for Energy (EN-1) which states that there	Table 5-1 has been updated in the **FRA** (Doc Ref 6.3 Rev 2) to include estimated panel densities for all four Land Parcels, and paragraphs 5.3.29 to 5.3.31 have been amended to reflect panel legs covering all four of the Land Parcels. Table 5-2 in the **FRA** (Doc Ref 6.3 Rev 2) has been clarified within the response to EA15 to include the relevant modelled event the calculations are based upon. The title of Table 5-2 has been amended to note "Volume loss calculations for the solar panel legs". Solar panel legs specifically within Parcel D Gotts catchment result in a depth increase of up to 0.0002m (0.2mm). The **FRA** (Doc Ref 6.3 Rev 2) demonstrates that, even with potentially significant flood depths, solar panel legs have no material impact on floodplain volume across the Solar Development Area, as agreed by the EA during pre-application	mounting infrastructure is included in the volume loss calculations for Gotts catchment

Topic	Matter Raised	Applicant's Response	EA Response
	should be no net loss of floodplain storage and any constriction of flood flow routes should be safely managed within the site.	engagement. With the panel density in Land Parcel D less than that of Land Parcel A, it is considered Gotts by itself will not be materially impacted by solar PV panel legs. It is noted that the hydraulic modelling undertaken has assessed panel legs volumes across all Land Parcels within the models, from the River Welland breach scenario and the Postland and South Holland Main Drain flood depths.	
EA19 Mitigation measures for solar PV panels	Conflicting information with regards to mitigation Difficult to appraise mitigation measures Please ensure consistency in reporting with regards to mitigation for the solar stations Paragraph 5.4.57 is confusing as this talks about the Solar PV panels and then that the solar stations do not require mitigation, however, the preceding paragraph (5.4.56) talks about raising the solar station plinths	Paragraphs 5.3.86 and 5.3.87 of the **FRA** (Doc Ref 6.3 Rev 2) have been updated to clarify that, for any solar stations located in an area where flood depths are less than 0.5m, the proposed raising of the solar station plinths provides sufficient mitigation and no additional bunding or flood wall mitigation is required. The sentence stating that the solar stations require no mitigation has been removed.	**Resolved at Deadline 2** **The applicants response is accepted**. An additional figure has been provided which includes a map showing the standard of protection of flood defences along the River Welland

Topic	Matter Raised	Applicant's Response	EA Response
	which is a form of mitigation. Paragraph 5.4.59 then goes onto talk about 0.6 metres of freeboard for the solar stations		
EA20 Assessment of Credible maximum tidal scenario	A credible maximum tidal scenario (H++) has not been assessed in line with guidance Flood risk impacts could be underestimated for a credible maximum tidal scenario The applicant should either apply an H++ climate change scenario in accordance with Flood risk assessments: climate change allowances (GOV.UK), or robustly justify their chosen approach, demonstrating that it appropriately represents a credible maximum (H++) tidal scenario. Sections 5.7.6 to 5.7.25 provide details on the H++ scenario for sea level rise, however, the approach does not align with the approach for assessing a credible maximum scenario (H++) in the context of	A sensitivity analysis for the Credible Maximum Tidal Scenario (H++) has been undertaken to assess the H++ allowance (1.90 m sea level rise to 2100) alongside an additional 2 mm/year storm surge allowance starting from 2017. The sensitivity analysis was carried out on the tidally influenced River Welland Breach Model and the South Holland Main Drain Model. ***River Welland Breach Model*** • *Methodology* - The downstream tidal boundary for the present-day 1.0% and 0.1% AEP events and the 1.0% and 0.1% AEP + CC (2115 horizon) events were extracted from the EA's MIKE 11 model. The present-day levels were compared	**Resolved at Deadline 2** The applicant's response is accepted. The additional information provided within Meridian Solar Farm Volume 6 Environmental Statement Appendix 11-3 Flood Risk Assessment Annex E is considered acceptable in terms of the assessment of a tidal H++ scenario and the implications for the development

Topic	Matter Raised	Applicant's Response	EA Response
	tidal flood risk described in the guidance on using climate change allowances for Flood Risk Assessment. The approach for assessing a credible maximum (H++) scenario for sea level rise is to apply 1.9 metres of sea level rise including an additional 2mm per year to account for storm surge. Further details on the approach for assessing a tidal H++ scenario can be found at Flood risk assessments: climate change allowances - GOV.UK 4. Groundwater and Contaminated Land	against the climate change scenario levels to determine the climate change impact already within the model , establishing an existing baseline uplift. The existing baseline uplift was deducted from the cumulative target 1.90 m H++ sea level rise allowance and total storm surge allowance from 2017 to 2100 to determine the additional uplift to be applied to the 2115 horizon climate change downstream levels to derive the downstream H++ tidal boundary level. The derived H++ downstream level was then used to extrapolate the (H++) water levels at key locations relative to the site, i.e., at the upstream and downstream extent of the water storage area between the inner	

Topic	Matter Raised	Applicant's Response	EA Response
		and outer embankment on the River Welland. • *Results* - Under the H++ scenario (1.0% AEP + CC and 0.1% AEP + CC), peak water levels in the river adjacent to the site reach up to 4.96 m AOD. • *Defences and Freeboard* - While the inner embankment along the river is overtopped into adjacent Water Storage Area, the outer embankment (minimum crest level 5.27 m AOD) maintains a minimum freeboard of 0.31 m (310 mm). Therefore, the outer embankment is not overtopped during the H++ credible maximum scenario, and the baseline breach scenario remains the critical worst-case flood mechanism for the site. ***South Holland Main Drain***	

Topic	Matter Raised	Applicant's Response	EA Response
		• *Methodology* - A sensitivity analysis evaluating a +0.50m increase on the downstream tidal boundary for the joint 0.1% AEP + climate change was undertaken as part of the initial modelling. This represented a 1.60 m sea level rise allowance (i.e., the 1.10 m sea level rise from the joint 0.1% AEP climate change + 0.50 m). To determine the target H++ allowance, an additional uplift was applied to the +0.50 scenario downstream level to achieve the cumulative 1.90 m H++ sea level rise allowance alongside the total storm surge allowance from 2017 to 2100. The derived downstream H++ allowance was used to extrapolate peak flood levels across all three internal pumped	

Topic	Matter Raised	Applicant's Response	EA Response
		catchments under pump failure conditions. • *Results* - Peak water levels increase by +0.092 m in the Fleet Fen catchment (max flood depth up to 0.50 m within the site) and by +0.291 m in Gotts catchment (max flood depths up to 0.80 m with the site). Water levels in the Wiseman catchment remain unchanged as they are governed by internal catchment dynamics. • *Infrastructure Protection* - Solar PV modules will be elevated to a minimum of 0.80 m above ground level, and solar stations/substations will be protected by flood bunds or raised (up to 1.35 m above ground in Land Parcel D1). All critical infrastructure remains elevated above peak H++ flood levels.	

Topic	Matter Raised	Applicant's Response	EA Response
		The H++ sensitivity analysis confirms that the proposed development and its embedded mitigation measures provide sufficient freeboard and resilience against external extreme tidal flood risk, demonstrating that flood risk impacts have not been underestimated. Full methodology, results and analysis are provided in H++ Sensitivity Analysis technical note.	
	Review of Hydraulic Modelling– EA comments regarding the River Welland, South Holland, and Postland modelling files.	The Applicant is in the process of reviewing these comments and preparing a response to the EA to provide a clarification in response to the comments received.	**Update at Deadline 3: This item remains under discussion**. River Welland - Resolved at Deadline 2 We have since reviewed: • South Holland Main Drain Modelling - Response to EA Comments v2.0

Topic	Matter Raised	Applicant's Response	EA Response
			• Postland Pumped Catchment Modelling - Response to EA Comments v2.0 and provided our comments to the applicant at a meeting 21/10/2026. Postland: There is no change in flood extent but the modelling predicts a minor increase in flood levels beyond the order limits. The applicant has agreed to investigate whether these minor increases in flood level can be avoided or mitigated. South Holland Main Drain:The impact of solar panel legs on flood storage has been assessed, and impacts are negligible.

Topic	Matter Raised	Applicant's Response	EA Response
			We await review of minor changes to the FRA at Deadline 4 to be able to close this issue.
Groundwater and Contaminated Land			
EA21 Contaminated Land Assessment	This chapter is supported by APP-174 ES Appendix 5-4: Contaminated Land Assessment and APP-175 ES Appendix 5-5: Contaminated Land Assessment for Grid Corridor Extension. The conclusions of these reports have not been noted or referenced within chapter 5. Information regarding land contamination could be omitted from the Environmental Statement Ensure any conclusions in the Environmental Statement are supported by reference to relevant information from Appendix 5-4 and 5-5.	As explained within Table 5-1 of **ES Chapter 5: Agriculture and Soils** [APP-056], an assessment of likely significant effects associated with contaminated land is scoped out of the EIA on the basis that the Preliminary Risk Assessments included within **ES Appendix 5-4: Contaminated Land Assessment** [APP-174] and **ES Appendix 5-5: Contaminated Land Assessment for Grid Corridor Extension** [APP-175] demonstrate that no significant effects are likely to occur with the implementation of standard industry practice measures. Standard industry practice measures to minimise risks associated with contaminated land have	**Resolved at Deadline 2** We are satisfied with the Applicants response given that land contamination has been scoped out of the EIA. Adequate measures are in place for the management of unexpected contamination throughout the duration of the scheme.

Topic	Matter Raised	Applicant's Response	EA Response
		been incorporated within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), and **ODEMP** (Doc Ref. 7.12 Rev 1). As such, no further assessment is presented within **ES Chapter 5: Agriculture and Soils** [APP-056].	
EA22 Risk to groundwater from trenchless crossings	The mitigation measures for trenchless crossings do not consider risks to groundwater. Risk of pollution of the secondary A aquifer beneath the site. Update the OCEMP to include groundwater as a receptor during the installation of trenchless crossings. The design of trenchless crossings beneath surface water bodies should be based on water feature surveys and Hydrogeological Risk Assessments, to ensure that drilling fluids would not pose a significant risk to controlled waters. These should be secured within the Outline Construction Environmental Management Plan.	Table 3-7 of **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated to reference groundwater as a receptor for potential impacts from trenchless crossing construction. However, as summarised within Table 11-1 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and within **ES Appendix 1-2: EIA Scoping Opinion** [APP-167], Table 3.4 ID Ref 3.4.1, the Planning Inspectorate agreed that groundwater aquifers were to be scoped out of further assessment in the ES due to the presence of unproductive superficial and bedrock strata. The MAGIC aquifer	**Resolved at Deadline 2** We are satisfied with the amendment made to the OCEMP (Doc Ref. 7.10 Rev 2) and agree that this issue has been resolved.

Topic	Matter Raised	Applicant's Response	EA Response
		classification map shows Secondary Undifferentiated Aquifer below the Site between Crowland and Holbeach Drove. Also, Secondary A Aquifer associated with the River Welland is located west of the Scheme. The bedrock is still classified as Unproductive Strata. This is stated in paragraph 11.6.30 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). Trenchless crossings works will take place under the use of standard and good practice mitigation measures for minimising risk to controlled waters, which includes both surface waters and any groundwater. This is noted within Table 3-7 Hydrology and Flood Risk in **OCEMP** (Doc Ref. 7.10 Rev 2). This includes the use of guidance within CIRIA report C532: Control of water pollution from construction sites[4], CIRIA report	

[4] CIRIA (2001). C532: Control of water pollution from construction sites – Guidance for consultants and Principal Contractors.

Topic	Matter Raised	Applicant's Response	EA Response
		C648 Control of water pollution from linear construction sites[5], and CIRIA report 'C736: Containment systems for the prevention of pollution[6]. Measures to manage spillage risk, during works for trenchless crossings, are also set out within Table 3-7 Hydrology and Flood Risk in **OCEMP** (Doc Ref. 7.10 Rev 2), which would minimise the risk of pollution to surface water and contaminants infiltrating to groundwater. To minimise risks associated with drilling fluids for non-intrusive cable crossings, a Site specific Fracture Risk Assessment will be prepared, as set out within Table 3-7 Hydrology and Flood Risk in **OCEMP** (Doc Ref. 7.10 Rev 2). This will include methodologies and mitigation required based on ground conditions to minimise the risk to groundwater and surface	

[5] CIRIA (2006). C648: Control of water pollution from linear construction projects, technical guidance.
[6] CIRIA 736 (2014) Containment systems for the prevention of pollution.

Topic	Matter Raised	Applicant's Response	EA Response
		water. A Pre-works Hydromorphology and Riparian Survey will be carried out for each watercourse subject to a trenchless crossing, as a precautionary measure, to ensure there is a record of the channel conditions prior to the works commencing to install cables beneath the bed.	
EA23 Unexpected contaminati on protocol	The unexpected contamination protocol does not include the need to contact the Local Authority and Environment Agency in the event contamination is identified. It does not mention the need to follow our Land Contamination Risk Management (LCRM) guidance. Risk of pollution to controlled waters may not be adequately assessed or controlled. Update the commitment to managing unexpected contamination in the OCEMP, OOEMP and ODEMP, including reference to LCRM and consultation with Local Authority and the Environment Agency.	The requirement to contact the Local Authority and Environment Agency and to follow Land Contamination Risk Management (LCRM) guidance in the event that contamination is identified has now been included in the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1).	**Resolved at Deadline 2** We are satisfied with the amendment made to the OCEMP (Doc Ref. 7.10 Rev 2) OOEMP (Doc Ref. 7.11 Rev 1) and ODEMP (Doc Ref. 7.12 Rev 1 and agree that this issue has been resolved.

Topic	Matter Raised	Applicant's Response	EA Response
	Our recommended process is as follows: 1. In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency. 2. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and		

Topic	Matter Raised	Applicant's Response	EA Response
	programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency. 3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2). 4. Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.		
Ecology and Fisheries			
EA24 Omission of	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales)	**ES Appendix 9-1: Ecology Legislation, Policy and Guidance** (Doc Ref. 6.3 Rev 1)	**Update at deadline 2: On-going.** **No change at Deadline 3**

Topic	Matter Raised	Applicant's Response	EA Response
fisheries legislation	Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 has not been included. Risk that the impacts on fish from the construction, operation and decommissioning have not been fully considered. Risk that an assessment on whether the proposal will cause deterioration to WFD status or prevent a waterbody achieving Good status has not been considered. Include reference to this legislation.	has been updated to include this legislation and the requirements of these legislation have been considered as part of the impact assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) and **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1).	We note and welcome the Applicant's response to this issue. However, the document ES Appendix 9-1: Ecology Legislation, Policy and Guidance (APP-204) has still not been updated with the following legislation: • The Salmon and Freshwater Fisheries Act (1975) • The Eels (England and Wales) Regulations (2009) • The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 Having met with the Applicant on 24/09/2026 to discuss this matter, we are confident that APP-204 (Ecology and

Topic	Matter Raised	Applicant's Response	EA Response
			Biodiversity Legislation) will be updated. We are also satisfied that the pieces of legislation have been considered throughout the relevant assessments and chapters of the ES. We await review of the revised document to resolve this issue
EA25 No fish surveys undertaken	No fish surveys were undertaken to support the ecological baseline assessment. This lack of surveys is not mentioned in the listed limitations of the EIA No fish surveys have been completed and therefore there is no accurate understanding of the fish baseline in watercourses/waterbodies within the draft order limits. Include the lack of fish surveys in the limitations of the EIA.	The lack of fish surveys has been included within the limitations section of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1), with confirmation as to the decision process for this. The absence of fish surveys, however, is not considered to affect the assessment findings. The majority of ditches are associated with arable fields, are controlled by a sluice, and include large numbers which were dry at the time of assessment. **ES Appendix 2-1: Watercourse Crossing Schedule** (Doc	**No change at Deadline 3 – remains On-going** We note and welcome the Applicant's update to the limitations section 9.5 of Chapter 9: Ecology and Biodiversity (APP-060). We have had discussions directly with the Applicant in a meeting on 24/09/2026 and are now satisfied with the assessment that was completed in understanding how waterbodies/watercourses within

Topic	Matter Raised	Applicant's Response	EA Response
		Ref. 6.3 Rev 1) has been updated for Deadline 1 to note which watercourses, where crossings are proposed, are assumed to be permanently wet or seasonally wet based on survey information, to provide an indication of their potential for fish habitat.	the draft Order Limits were either scoped in or out. Field visits were undertaken which showed that the majority of waterbodies/watercourses were seasonally dry and not suitable for fish, therefore we support the conclusion to scope out fish surveys at these waterbodies. Where waterbodies/watercourse were seen to be permanently wet, then appropriate design options and mitigation have been taken forward, which was discussed with the Applicant in the meeting on 24/09/2026. Furthermore, details of mitigation have been updated in the oCEMP (APP-275). Impacts to the South Holland Main Drain, which has records of European eel have been avoided

Topic	Matter Raised	Applicant's Response	EA Response
			by using trenchless crossing techniques which is detailed in ES Appendix 2-1: Watercourse Crossing Schedule (APP-169). We request that in addition to the mitigation detailed in the oCEMP that where any over-pumping of waterbodies/watercourses takes place, that pumps are fitted with 2mm aperture screens to protect European eel and fish. In addition, where pre-construction fish surveys take place, should notable fish assemblages be found including European eel, then this should inform the design considerations, which may include changing a culvert option to a clear-span crossing option. Furthermore, any culverts in permanently wet waterbodies/watercourses

Topic	Matter Raised	Applicant's Response	EA Response
			should be designed so as to preserve the natural bedform of the waterbody/watercourse, ensure fish passage is not impeded and where necessary provide fish easements within the culvert to enable fish passage. This should be captured in the oCEMP. We await review of the revised document to resolve this issue
EA26 Fish scoped out of EIA	We are not satisfied that fish can be scoped out on the basis that potential impacts have been addressed with embedded mitigation in the oCEMP. We do not agree with this approach. The assumption that fish are not present within the draft order limits is un-evidenced, and the mitigation for open-cut trenching and culverting is insufficient. No appraisal of the watercourse and waterbodies on site has been provided.	**ES Appendix 2-1: Watercourse Crossing Schedule** (Doc Ref. 6.3 Rev 1) has been updated for Deadline 1 to note which watercourses, where crossings are proposed, are assumed to be permanently wet or seasonally wet based on survey information, to provide an indication of their potential for fish habitat. Where permanently wet watercourses are identified, the schedule	**No change at Deadline 3 – remains On-going** Comment as per EA25 We await review of the revised document to resolve this issue

Topic	Matter Raised	Applicant's Response	EA Response
	Risk of impacts to fish from in channel and open-cut works . Where in-channel works are proposed a thorough understanding of the aquatic ecology and fish baseline is required. Fish surveys may be required to inform the design of appropriate mitigation. This was flagged at EIA scoping and PEIR and has not been sufficiently addressed. APP-205 ES Appendix 9-2: Preliminary Ecology Appraisal Report, Photograph 30 Sly's Connection. APP-075 Watercourse Crossings Locations Sheet 11 This waterbody appears to be permanently wet and appears to correlate with crossing location 50 which is proposed for open cut culverting. A fish survey should be completed in order to inform potential impact and thus mitigation design. If the applicant does not undertake a fish survey then further justification and evidence is required to support this decision.	has been updated to indicate where a clear span solution is proposed instead of a culvert, subject to detailed design. **ES Appendix 2-1** (Doc Ref. 6.3 Rev 1) demonstrates that most drains / ditches where watercourse crossings are proposed only had low or no levels of water present during surveys (i.e. are assessed to be only seasonally wet), and as such, would be of limited value/use by fish. Where water is permanently present, pollution prevention measures and timing of works (to avoid spawning periods) will be considered for detailed design, as set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). Where culverts are proposed as part of the watercourses crossings, these will not prevent continued movement upon completion of works with details to be provided with detailed design, as secured through the **OCEMP** (Doc Ref. 7.10 Rev 2).	

Topic	Matter Raised	Applicant's Response	EA Response
		The **OCEMP** (Doc Ref. 7.10 Rev 2) has been also been updated to include a firmer commitment to clear span structures, Pipe culverts for access road crossings will typically only be appropriate on small, seasonally dry channels. On permanently wet watercourses, clear span structures will be used, except where the crossing forms part of a bellmouth access or where an alternative crossing solution is justified through the detailed design process. In such cases, it must be demonstrated that there would be no significant adverse effects on fish. The Environment Agency would be consulted as part of the detailed design process, and suitable mitigation measures incorporated into the crossing design. There are no watercourse crossings proposed across Slys Connection Local Wildlife Site (LWS) (watercourse crossing	

Topic	Matter Raised	Applicant's Response	EA Response
		50 is not located on Slys Connection), whilst works on South Holland Drain West LWS are to an existing bridge only, which may comprise works to or the replacement of the existing bridge. Measures to mitigate effects from these works with regards to pollution prevention and the timing of works are secured through the **OCEMP** (Doc Ref. 7.10 Rev 2). The assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) has been updated and is considered sufficient to inform the identification of mitigation requirements and likely significant effects within the ES.	
EA27 Fragmentation/ barriers to dispersal	Fish are not mentioned as a potential receptor to impacts from fragmentation/ barriers to dispersal (eg. from culverting and open-cut trenching of watercourses). Risk of disruption of dispersal patterns of fish and impacts to fish population.	As set out within the responses above, no significant effects on fish are considered likely, with the implementation of measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). **ES Chapter 9 Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) has	**No change at Deadline 3 – remains On-going** We note the Applicant's response and also the discussions in the meeting with the Applicant on 24/09/2026. We

Topic	Matter Raised	Applicant's Response	EA Response
	Include this impact-pathway to fish receptors in the assessment.	been updated for Deadline 1 to include fish as a potential receptor with supporting details provided to set out why no significant effects are considered likely.	welcome the use of clear span crossings on permanently wet waterbodies/watercourses. Where bell mouth crossings are proposed, the EA request that any culverts in permanently wet waterbodies/watercourses should be designed so as to preserve the natural bedform of the waterbody/watercourse, ensure fish passage is not impeded and where necessary provide fish easements within the culvert to enable fish passage. This should be captured in the oCEMP. We await review of the revised document to resolve this issue
EA28 Grid	We disagree with the intention to scope out the grid connection route. The report states that open cut trenching may be used. This	**ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) (Table 3-3) has been updated at Deadline 1. This screens in the Grid	**No change at Deadline 3 – remains On-going**

Topic	Matter Raised	Applicant's Response	EA Response
connection route	could create an impact pathway if used across watercourses. Risk of impacts to impacts to fish and aquatic ecology and deterioration in WFD status. Scope the grid connection route into the WFD assessment and ensure impacts to fish and aquatic ecology are assessed.	Connection Route where cable undergrounding cannot be ruled out at this stage. Potential impacts associated with open-cut watercourse crossings had already been provided within the WFD assessment for other cabling activities. However, this update ensures that the same construction techniques, where they may be required as part of the Grid Connection Route, are also expressly captured within the WFD assessment. The WFD assessment had already considered qualitatively the potential impacts to fish and macroinvertebrate biological quality elements. An assessment of the potential impacts associated with undergrounding sections of the Grid Connection Route have also now been undertaken. Overall, the changes have not altered the conclusions of the WFD assessment in that it would	We note the Applicant's response and welcome the updated wording in ES Appendix 11-2 WFD Report (APP-221). In addition to this we agree with the conclusion of the WFD assessment, provided the updates we have suggested for EA25/EA26 and EA27 are included in the oCEMP. We await review of the revised document to resolve this issue.

Topic	Matter Raised	Applicant's Response	EA Response
		not give rise to any deterioration in WFD status or prevent the achievement of WFD objectives.	
EA29 Eel entrapment	There is the risk of any discharge pipes from swales to watercourses becoming an attractant for European eel, resulting in entrapment. Entrapment of eel to undesirable habitat and loss of eel to the system. Ensure discharge pipes are designed on such a way that excludes eel from entering.	Pipe connections from swales to watercourses have been minimised. The discharges to watercourses will be via pipe outfall; however, where possible, surface water will drain from the Solar Development Area's swale -based drainage system to local receiving watercourses via a new open green ditch. This is secured within **ES Appendix 11-4 Outline Drainage Strategy** [APP-227]. The design of any pipe outfalls will be confirmed at the detailed design stage, however, it is confirmed they will allow continued movement through them given they will all be open ended. As such, no significant effect as a result of the potential for the entrapment of eel / elvers is considered likely. Utilising a mesh or	**No change at Deadline 3 – remains On-going** Following the discussion with the Applicant on the 24/09/2026 and their response to our Relevant Representation, we are in agreement that screening of pipe outfalls would not be feasible or necessary given the relatively low risk posed to European eel in the waterbodies/watercourses within the draft Order Limits. However, we welcome the inclusion of open green ditches to local receiving watercourses in the design. In the meeting on 24/09/2026 the EA requested whether pipe

Topic	Matter Raised	Applicant's Response	EA Response
		similar form of screening at pipe entrances to prevent access is not feasible as the associated mesh screen size would need to be small to prevent any eels/elvers from entering. This in turn would result in a significant increase in the maintenance requirements, as there would be an increased risk of blockages.	outfalls could be positioned above water line of receiving watercourses, the Applicant is going to look into this, and we await their response.
EA30 Ecological impacts of watercourse trench crossings	The construction will involve open-cut trenching to cross watercourses. Open cut methods for cabling or pipelines can destroy habitats, including those of protected species such as the water vole. Disturbance to, and loss of habitat for water vole. Provide further detail regarding reinstatement of bankside habitats along watercourses and ditches after completion of works. This should include sowing the bankside habitats with a species rich locally appropriate sward, and if necessary	The design of the watercourse crossings will be confirmed at the detailed design stage, in accordance with the design principles and parameters secured through the **Design Parameters** (Doc Ref. 7.4 Rev 2) and **OCEMP** (Doc Ref. 7.10 Rev 2). The wording within the **OLEMP** (Doc Ref. 7.16 Rev 1) has however been reviewed and updated to include reference to sowing banksides with a species rich locally appropriate sward, and if necessary, erecting fencing to prevent livestock access during establishment. Detailed design would be	**Update at Deadline 3: Resolved** We are satisfied with the response provided.

Topic	Matter Raised	Applicant's Response	EA Response
	erecting fencing to prevent livestock access.	subject to a Pre-works Hydromorphological and Riparian Corridor Survey of the final watercourse crossing locations, which will record channel features/habitats and provide the baseline, against which reinstatement will be designed, and further consultation with Internal Drainage Boards, as set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). The mitigation for water voles has been discussed and agreed in principle with Natural England as part of consultation meetings, as can be evidenced from the **Statement of Common Ground with Natural England** (Doc Ref. 8.13).	
Geomorphology			
EA31 Duration of	Watercourse Temporary Crossings – Temporary is undefined thus it is unclear as	Paragraph 11.7.16 in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated to state that	**Update at Deadline 3: Resolved** We are satisfied that REP1-021 Paragraph 11.7.16 ES Chapter

Topic	Matter Raised	Applicant's Response	EA Response
'temporary' works	to what length of time these crossings may remain in place. Risk of longer-term impacts to the water environment, which may cause a decline in WFD status. Unless activity is less than 6-months and any effects can also be remediated within that 6-month period, assess these activities as if they were permanent works and put in place appropriate mitigation. The EA is a competent authority for WFD. Our internal guidance regarding WFD for low-risk activities considers short-term as being activities that are 6 months or less in duration, and where effects of those activities undertaken also last less than 6 months. Any activity/action that takes longer or causes an effect longer than 6 months should be assessed as if it were permanent/high risk. This includes installation/removal of "temporary" access crossings.	temporary crossings will be in place for up to four years, the construction of which has been assessed in paragraph 11.8.5. Mitigation has already been committed to on the design of culverts and on channel reinstatement, as set out within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) (see summary below) and secured through **OCEMP** (Table 3-7) (Doc Ref. 7.10 Rev 2). Paragraph 11.7.19 within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) states that "*all temporary crossings will be removed after completion of the construction works (up to four years) and the watercourses reinstated informed by a Pre-works Hydromorphological and Riparian Corridor Survey as discussed earlier under 'Watercourse Cable Crossings. This will seek to reinstate as found as a minimum whilst also considering*	11: Hydrology and Flood Risk has been updated to provide a time frame for the temporary nature of the access crossing works - i.e. up to a maximum of 4 years. Informative: The applicant should be aware that a recent update in EA Works in Rivers guidance now considers the installation/ decommissioning of culverting to be typically a high risk activity, regardless of scale (i.e. temporal or spatial), and should be assessed as such. Bridges/crossings are also typically medium risk, regardless of scale. Therefore the advice previously provided regarding 6-month "temporary" works in rivers has now been superseded.

Topic	Matter Raised	Applicant's Response	EA Response
		opportunities for enhancement. Furthermore, during reinstatement, any subsequent improvements to the watercourse that have occurs upstream or downstream by other initiatives can be taken into account, although as this is within the construction site any changes in baseline are unlikely." Table 3-4: in **ES Appendix 11-2: Water Framework Directive Report** (Doc Ref. 6.3 Rev 1) has been updated to state that temporary crossings will be in place for up to four years. **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) includes an assessment of permanent crossings. **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated in paragraph 11.8.5 to specifically add the construction of temporary watercourse crossings (up to four years) to pollution risk from construction impacts. Temporary impacts	

Topic	Matter Raised	Applicant's Response	EA Response
		on hydromorphology of watercourses during the construction phase are included in paragraph 11.8.12. Both are assessed in Tables 11-9 and 11-10. These impacts are not also assessed within the Operational section for Hydromorphological impacts, due to avoiding double counting of potential effects (see paragraph 11.8.52). The WFD Assessment within **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) concludes that any impacts associated with temporary and permanent crossings will be localised, mostly on minor drainage channels within the WFD water body catchments, and not significant at the WFD water body scale. The Scheme would therefore not cause deterioration in the status of any WFD water body or prevent the water bodies achieving target status noting the embedded environmental mitigation.	

Topic	Matter Raised	Applicant's Response	EA Response
EA32 Use of pipe culverts	The proposed use of pipe culverts for temporary watercourse crossings may have a detrimental impact on the aquatic environment. Potential for damage to the water environment through throttling of flows and interference in sediment movement. Consider each watercourse crossing on a case-by-case basis to determine which watercourse crossing method has the least impact. Where unavoidable, pipe culverts, should be sized appropriately and allow water and sediment conveyance, without increasing velocity of flow under normal conditions. Pipe culverts should be restricted to those watercourses that are predominantly dry throughout the year. Pipe culverts, if inappropriately sized, can result in chute flow under otherwise normal conditions. The resultant increased velocity of flow may increase the likelihood of scour and therefore the necessity of	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and **OCEMP** (Doc Ref. 7.10 Rev 2) state where possible existing accesses will be used unmodified or slightly modified as required. Where new temporary access crossings are needed, the design of each crossing will be addressed at detailed design on a 'case by case' basis and will ensure that they are sized to not impact on flow conveyance and ensure capacity for peak flow rates. These designs will be agreed with the IDB, where required, depending upon ownership of the asset, as managed by protective provisions within the **Draft DCO** (Doc Ref. 3.1 Rev 2). An assessment for each water feature based on assumed reasonable worst-case parameters for a proposed structure is presented within Table 11-9 and Table 11-10 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). A pipe	**Update at Deadline 3: Resolved** We are satisfied with the applicant's response.

Topic	Matter Raised	Applicant's Response	EA Response
	downstream scour protection/channel reinforcement.	culvert was assumed given the desire to be able to easily remove the structure following completion of construction works. However, as mentioned above, flexibility is retained in the DCO for both clear-span or culvert structures, with the latter not necessarily a pipe. The majority of watercourses are low grade, low gradient and gently flowing managed drains with limited erosion and sediment transport potential. As a result of these hydromorphological characteristics there is limited potential for impacts from throttling of flows and interference with sediment movement. Assuming pipe culverts for temporary access no significant effects were predicted in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) or non-compliance with WFD objectives in **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1).	

Topic	Matter Raised	Applicant's Response	EA Response
		Notwithstanding this, the Applicant has undertaken a review of the 37 no. locations where temporary accesses are required, and can confirm that in the majority of case the watercourse being crossed can be described as small and seasonally dry based on our site observations and desk study. However, the **OCEMP** (Doc Ref. 7.10 Rev 2) has also been updated to include a firmer commitment to clear span structures: "*Pipe culverts for temporary access road crossings will typically only be appropriate on small, seasonally dry channels. On permanently wet watercourses, clear span structures will be used where practicable and safe to do so, except where the crossing forms part of a public highway access point (bellmouth access) or where an alternative crossing solution is justified through the detailed design process. In such cases, it must be demonstrated that*	

Topic	Matter Raised	Applicant's Response	EA Response
		there would be no significant adverse effects on fish. The Environment Agency would be consulted as part of the detailed design process, and suitable mitigation measures incorporated into the crossing design."	
EA33 Open cut trenched cable crossings	Open-cut techniques for watercourse cable crossings can destroy channel bedforms and weaken banks. Increased risk of bank erosion/ collapse and loss of channel bedform following inadequate reinstatement of open-cut crossings Avoid and/or reduce the number of open-cut cable crossings via careful route design. If open-cut techniques are required, ensure that pre- excavation survey is completed, and that geological layers can be restored to correct layering. Keep channel substrate separate from the rest of the excavated material so that the channel habitat can be correctly restored.	The fenland landscape that the Site is located within is characterised by drains / ditches along almost every field boundary. Therefore, there is a large number of watercourse crossings required for the construction of the Scheme infrastructure, as demonstrated by **ES Appendix 2-1: Watercourse Crossing Schedule** (Doc Ref. 6.3 Rev 1). The number of cable crossings required has been reduced through the adoption of an overhead line design for the Grid Connection Route and the Overhead Inter-Array Connection, albeit cable crossings would still be required for cabling within the Solar Development	**Update at Deadline 3: Resolved.** Re-instatement of open-cut trench watercourse crossings has been better defined in Table 3-7 of the OCEMP [REP1-061].

Topic	Matter Raised	Applicant's Response	EA Response
	If contaminated sediment is found to be and has to be removed from site, restore channel substrate using local materials of similar geology/grain size.	Area, Underground Inter-Array Connection, and within the Grid Connection Route between CSECs, north of High Road, if an underground cable option is adopted (i.e. Work No 14 area), and for the undergrounding of DNO assets, if required. The Scheme has committed to trenchless crossings underneath major watercourses with permanent flow (e.g. South Holland Main Drain). The Applicant's preferred design is to use an overhead line north of High Road (Work No 14 area) and to oversail DNO assets, therefore, reducing the number of cable crossings required. However, as the detailed design is subject to further engagement with NGET and DNOs, the ES provides a worst-case assessment of all watercourses where open trench crossings may be required. For the intrusive crossings, Table 3-7 within the **OCEMP** (Doc Ref. 7.10 Rev 2)	

Topic	Matter Raised	Applicant's Response	EA Response
		sets out the potential risks and mitigation measures for the construction of open cut watercourse crossings. Measures which are secured within the **OCEMP** (Doc Ref. 7.10 Rev 2) include a Pre-works Hydromorphological and Riparian Corridor Survey which will be undertaken to record channel features/habitats and provide the baseline, against which reinstatement will be designed. The **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated to clarify that the banks and the bed will need to be appropriately reprofiled with the inclusion of suitable geomorphic features and geological layers would be restored to correct layering. Channel substrate would be kept separate from the rest of the excavated material so that the channel habitat can be correctly restored. If contaminated sediment is found and has to be removed from Site, channel substrate would be restored using local	

Topic	Matter Raised	Applicant's Response	EA Response
		materials of similar geology/grain size. Banks will be replanted with suitable riparian species, as set out within the **OLEMP** (Doc Ref. 7.16 Rev 1). Additionally, with regard to the loss of channel bedform, the watercourses impacted by the Scheme are managed drainage channels, where regular dredging to maintain the drainage capacity of the channels is undertaken. The regular dredging will also result in loss of channel bedform on a regular basis.	
Water Quality			
EA34 Water quality monitoring	The Water Management Plan (WMP) does not commit to any sampling, and the frequency and duration of monitoring is unknown. Table 3.4 of OOEMP doesn't include WMP despite there being post-construction water quality monitoring.	The **OCEMP** (Doc Ref. 7.10 Rev 2) commits to the production of a detailed Water Management Plan (WMP), which has been agreed as a suitable approach on other similar NSIP Schemes. The WMP (which will be produced post consent) will	**Update at Deadline 3: unresolved** The OCEMP (REP1-062) Table 3-7 has been updated under Monitoring Requirements to commit that "Water quality

Topic	Matter Raised	Applicant's Response	EA Response
	If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, on water quality during the construction and operation phases. The Applicant should provide further details, including frequency and duration, of water quality monitoring. We support that a Water Management Plan will include details of pre-construction, construction, and post-construction water quality monitoring. However, the statement "it is anticipated that this will be based on a combination of visual observations and in situ monitoring upstream and downstream of the working area", should be strengthened to a firm commitment. The WMP does not recognise that water samples will need to be taken and sent to a laboratory to test for heavy metals, nutrients and dissolved/suspended solids. Applicant should confirm there will be in-situ measurements using MCERTS approved methods and water samples will	also include details of pre, during and post-construction water quality monitoring. Water quality monitoring is anticipated to be required 6 months prior to the preliminary works starting (pre-construction), during construction and for a few months post completion. The purpose of the monitoring is to help with the early identification of any pollution from the construction works and not to compare the before or after water environment conditions. As such, the WMP requirement is tied to the **OCEMP** (Doc Ref. 7.10 Rev 2) rather than the **OOEMP** (Doc Ref. 7.11 Rev 1). Routine grab samples collected at arbitrary times will not support the identification of pollution events as they may not coincide with when one is occurring, and time is needed for the laboratory to report the result. As such, it is considered more appropriate to use on	monitoring is anticipated to be required 6 months prior to the preliminary works starting (pre-construction), during construction and for a few months post completion". We agree that a more detailed Water Management Plan (WMP) will be available for review as part of the final CEMP, for which we are a named consultee However, unless there will be a break in phases between construction completion and operation then it is likely that "few months post completion" will be occurring during operation. Therefore, for consistency between documents, and to support contractors who are not guaranteed to be the same

Topic	Matter Raised	Applicant's Response	EA Response
	be sent to a UKAS accredited laboratory. The WMP should not rely on the Environment Agency's monitoring network, as suggested in the WFD Report. Monitoring should start at least 6 months prior to construction to establish a representative baseline water quality. It should continue throughout construction and into operation to ensure there are no impacts as a result of the phase change. Locations and specific parameters/methods can be agreed with the EA at detailed design. Monitoring locations should include upstream and downstream of any proposed surface water outfalls and water crossings at a monthly frequency.	site observations and in situ testing to support decisions about immediate action. However, grab samples may be useful collected at a lower frequency to monitor general back groundwater quality, performance of treatment systems, and to investigate issues or potentially test the quality of water held in lagoons etc., forming part of temporary construction drainage, prior to their discharge, whilst complying with any Water Discharge Activity Permits that have been agreed with the EA. Where grab samples are to be included a suitable baseline would need to be collected. Details can be provided in the WMP prepared post-DCO and the EA consulted as required. The above has been clarified within the **OCEMP** (Doc Ref. 7.10 Rev 2) submitted at Deadline 1.	between phases, water quality monitoring should be included in the OOEMP (REP1-064) and in HF-2 in Environmental Mitigation & Commitments Register (REP1-058). There are a number of documents listed below which use phrasing around grab samples which we disagree with: • Relevant Representations Report (REP1-074) • Chapter 11 Hydrology and Flood Risk (REP1-021), section 11.7.4 • Appendix 11-2 Water Framework Directive Report (REP1-047), section 4.2.4 The Applicant recognises that "grab samples may be useful

Topic	Matter Raised	Applicant's Response	EA Response
			collected at a lower frequency" but it is our position that the use of "*may*" does not strongly secure additional grab samples. We consider that grab samples taken on a regular basis, as part of a monitoring plan alongside in-situ measurements, provide quantitative data to assess environmental impacts and the effectiveness of mitigation measures, thus providing evidence that there is no deterioration in water quality when compared to baseline conditions. Routine grab samples (that are not triggered by a visually identified pollution) may detect pollutants that do not produce visible signs of contamination.

Topic	Matter Raised	Applicant's Response	EA Response
			The applicant should update the OCEMP as per our Relevant Representations (RR-047), which states that in- situ measurements will use MCERTS approved methods and grab samples will be taken on routine basis, and these water samples will be sent to a UKAS accredited laboratory.
EA35 Watercourse receptor importance	When considering watercourse receptor importance, it is unclear how downstream watercourses have been included in assessment. If watercourses are not given a high enough receptor importance, then mitigation measures to provide protection may be inadequate. Impacts on smaller watercourses which have no WFD classification can still impact downstream watercourses which do have a WFD classification.	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) paragraphs 11.4.1 to 11.4.7 outline the approach to the study area for the assessment. For the purposes of this assessment, a general study area of 1km around the Order Limits has been considered in order to identify water features that are hydrologically connected to the Order Limits and potential works associated	**Update at Deadline 3: resolved.** We are satisfied with the Applicant's comments.

Topic	Matter Raised	Applicant's Response	EA Response
	We believe the Applicant should increase the receptor importance to High (from Low or Medium) even where a watercourses does not have a WFD classification, if it flows into a WFD classified watercourses and there could be downstream effects.	with the Scheme that could cause, or lead to, impacts. **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) paragraph 11.4.7 acknowledges that watercourse flow and water quality and flood risk impacts can propagate downstream, and therefore, the assessment also considers a wider study area, where relevant. Regardless of the importance of water features, it is an offence to pollute a controlled water, and therefore mitigation has been included within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), and **ODEMP** (Doc Ref. 7.12 Rev 1) to avoid pollution of all controlled waters. The importance is used to determine the significance of the effect in the ES to inform planning decisions and not the degree of pollution prevention mitigation provided to any given receptor.	

Topic	Matter Raised	Applicant's Response	EA Response
		Watercourses across the study area ultimately drain to the River Welland (land parcels A, B and C) and River Nene (land parcels B and D). The Grid Connection Route is also located within these catchments. The River Welland is considered to be the final receiving water feature in the catchment draining to it that could conceivably be affected, whilst considering its size and factor of dilution available. However, in the case of the River Nene, this is approximately 13km to the east, and significant effects would not be expected at this distance, thus the South Holland Main Drain is considered the final receptor in that catchment. Impacted watercourses have been assigned an importance in accordance with criteria set out within Table 11-4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). As watercourses impacted downstream	

Topic	Matter Raised	Applicant's Response	EA Response
		have also been considered within the assessment, it is not considered necessary to revise the importance of upstream watercourses on the basis of which downstream watercourse they discharge into, as impacts on the latter are already assessed separately.	
EA36 Water quality baseline	Table 1-3 does not include any pH, temperature, conductivity, and dissolved oxygen data, and neither Table 1-3 or 1-8 includes any turbidity data, when summarising the water quality baseline. An accurate water quality baseline cannot be established and the potential for ecological impacts arising from changes in water quality cannot be fully assessed. This data should be collected as part of the pre-construction water quality monitoring secured by the Water Management Plan to ensure an accurate baseline is assessed.	Paragraph 1.3.14 within **ES Appendix 11-5** [APP-233] states that Table 1-3 uses data from the Environment Agency Monitoring locations, and that the parameters were limited. Table 1-8 includes data for Lower Welland – A151, Lower Welland – Runway, and Lords Drain Near Spalding. This includes pH, temperature, and dissolved oxygen data. There is no turbidity data in this dataset. The Water Quality Data Explorer was not functional at the time of writing to allow interrogation of turbidity data.	**Update at Deadline 3: Unresolved.** The OCEMP (REP1-062) Table 3-7 commits to a post-consent Water Management Plan detailing pre, during and post-construction water quality monitoring. Table 3-7 text should be amended to secure that this monitoring would include pH, temperature, conductivity, dissolved oxygen and turbidity", as per the Applicant's statement in

Topic	Matter Raised	Applicant's Response	EA Response
	Table 3-4: WFD Scoping of the Scheme's Components and Activities Against WFD Quality Elements does not mention Turbidity in Physico-chemical Quality Elements. The Water Framework Directive (WFD) does not specify a specific limit for freshwater turbidity. However, it emphasizes the importance of monitoring and assessing water quality to ensure that freshwater bodies remain in good condition. High turbidity levels can indicate poor water quality and may have negative impacts on aquatic ecosystems.	The Water Management Plan (which will be produced post consent), as outlined in the **OCEMP** (Doc Ref. 7.10 Rev 2) will require pre, during and post-construction water quality monitoring. The monitoring as part of the pre-construction would include pH, temperature, conductivity, dissolved oxygen and turbidity. Paragraph 11.4.12 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) states that the "*importance of water features has been determined from a holistic review of water feature attributes. The importance level does not rely on whether water quality is Poor, or Good, due to the principle that no controlled water (i.e. essentially all water features that are not sewers and drains to sewers) may be polluted (with a controlled water having the meaning as set out on Section 104 Part 3 of the Water Resources Act 1991). Water quality*	Relevant Representations Report (REP1-074). In response to Relevant Representations Report (REP1-074), we disagree with the Applicant's statement on the purpose of the monitoring. We agree that monitoring can help with the early identification of any pollution from the construction works. However, monitoring is also crucial to provide evidence that, compared to the baseline established pre-construction, no water quality deterioration occurs during construction. Our comments on EA34 should be read in relation to this issue too.

Topic	Matter Raised	Applicant's Response	EA Response
		impacts have also been based on a qualitative risk assessment that does not require input of raw background water quality data". Therefore, the lack of turbidity data has not impacted on the assessment. Monitoring will commence before the preliminary works start and continue throughout the main works and for a few months post completion. The purpose of the monitoring is to help with the early identification of any pollution from the construction works and not to compare the before or after water environment conditions.	
EA37 Foul water management	Foul water flows will be captured by a sealed cesspit during operation, but it is unclear what provision is proposed for construction and decommissioning phases. Foul drainage should be scoped into the WFD Screening until further clarity is provided.	The **OCEMP** (Doc Ref. 7.10 Rev 2) and **ODEMP** (Doc Ref. 7.12 Rev 1) state that foul drainage during construction and decommissioning will be dealt with by self-contained cesspits and will be regularly emptied by a waste management contractor. This would include use of self contained porta-loos	**Update at Deadline 3: Resolved** We are satisfied that the OCEMP (REP1-062) says "Scheme construction foul drainage is expected to be provided by self-contained cesspits (or similar sealed tank), regularly emptied

Topic	Matter Raised	Applicant's Response	EA Response
	Risk of foul water entering the water environment and deteriorating the water quality. Confirm the use of sealed cesspits for all development phases, and how foul waste will be managed prior to construction of cesspits. Commitment HF-7 should include foul drainage management for all development phases. We acknowledge it says that “waste can be regularly pumped out by a specialist contractor for off-site disposal at a licenced waste facility (i.e. no discharges to ground or a watercourse are proposed”, but this must be clear that there will be no discharge to the water environment during any phase of the development.	type structures during early stage construction. No discharge to the water environment is proposed in any phase of development. Paragraph 11.4.35, 11.4.39 and 11.7.5 in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and Table 3-3 in **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) have been updated at Deadline 1 to refer to these arrangements for foul drainage during construction and decommissioning. Similarly, sealed cesspits to collect foul waste for offsite disposal will be provided for the on-site office during operation. This is set out in paragraph 11.7.51 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) which also confirms that there will be no discharges to ground or a watercourse of treated foul wastewater in any phase of development. Commitment HF-7 within the **Environmental Mitigation and**	by a waste management contractor" in Table 3.7. Words to the same effect are seen in section 2.3.2 in OOEMP (REP1-064) and Table 3.7 in ODEMP (REP1-066).

Topic	Matter Raised	Applicant's Response	EA Response
		Commitments Register (Doc Ref. 7.7 Rev 1) is specific to the operational phase. However, reference to the foul water management arrangements for construction and decommissioning has been added to Commitments HF-1 and HF-3.	
EA38 Concrete mitigation	Concrete mitigation measures have not been detailed. Construction of concrete can be a risk to water quality as it is a known source of hazardous substances, particularly during the curing phase. The WFD Report states that concrete wash water will be prevented from entering any drain but this must be secured in the OCEMP. Risk of pollution to surface waters. Provide further details on the use of concrete and how it will be managed. Further details should include:	There will be no concrete batching plant on site. The use of concrete pours for foundations of Scheme infrastructure will occur and be controlled by measures established within the **OCEMP** (Doc Ref. 7.10 Rev 2). Concrete foundations would be used for Solar Stations, structural components of the On-Site Substations and BESS Compound, pylon leg foundations for the 400kV pylons, and structural components of the CSECs. Within **OCEMP** (Doc Ref. 7.10 Rev 2) Table 3-7, it is noted that particular care will be taken with the delivery and use of	**Update at Deadline 3: Resolved** Advice to Applicant – we recommend that the oCEMP Table 3.7 is updated to commit to minimising concrete works during heavy precipitation events and carried out during dry months, where practicable.

Topic	Matter Raised	Applicant's Response	EA Response
	• Identify all areas where concrete works are proposed • Specify whether these will be cast in situ or precast and delivered. • For in situ concrete pours, Applicant should suggest timing, weather conditions, and runoff control. Construction works should be minimised during heavy precipitation events and carried out during dry months where practicable. • Describe containment measures for concrete washout (e.g. lined washout pits, bunded areas) We acknowledge the intention to use p re-fabricated headwalls for the drainage outfalls to avoid the need to pour wet concrete close to a watercourse .	concrete and cement as it is highly corrosive and alkaline. The use of good practice and adherence to good practice guidance is noted in the **OCEMP** (Doc Ref. 7.10 Rev 2), this includes reference to CIRIA C532 Control of Water Pollution from Construction Site. C532[7] includes recommendations for general concrete and grouting works on site. No operational Scheme infrastructure is situated within 10m of any surface water feature, apart from watercourse crossings. Requirement for suitable facilities for concrete wash water to be provided during construction is also set out within Table 3-7 of **OCEMP** (Doc Ref. 7.10 Rev 2). Precast headwalls have been specified in the **OCEMP** (Table 3-7 Doc Ref. 7.10 Rev 2). There will be no batching plant on site,	

[7] CIRIA (2001). C532: Control of water pollution from construction sites – Guidance for consultants and Principal Contractors. Available at: https://www.ciria.org/CIRIA/productexcerpts/c532.aspx

Topic	Matter Raised	Applicant's Response	EA Response
		but as noted above there would be concrete pouring from concrete mixers in the area of foundations as highlighted above. As per industry standards like C532, concrete pouring would be avoided in wet weather. Rainfall alters the critical water-cement ratio and can wash away cement slurry, causing environmental contamination to both surface and groundwaters. As secured in the **OCEMP** (Doc Ref. 7.10 Rev 2), Table 3-7, suitable facilities for concrete wash water (e.g. geotextile wrapped sealed skip, container or earth bunded area) will be adequately contained, prevented from entering any drain, and removed from the Site for appropriate disposal at a suitably licensed waste facility.	

Topic	Matter Raised	Applicant's Response	EA Response
		The WMP will include more detail on the use of concrete products.	
EA39 Wash water	Lack of clarity regarding the management, containment and disposal of wheel wash water. If wash water is not managed correctly, it can enter watercourses and impact on water quality. Provide clarity that vehicle and wheel washing activities will be undertaken within a designated impermeable or lined area. Wash water should be contained to prevent contaminated water entering waterbodies or groundwater. The frequency of maintenance of the wheel washing system should be specified. Provide clarity that, if discharge on-site is required, a water discharge activity permit will be sought from the Environment Agency. Rumble strips and dry brushing could be used to remove mud from wheels to help minimise risk to water quality.	Requirements for the management, containment and disposal of wheel wash water are contained within the **OCEMP** (Doc Ref. 7.10 Rev 2) in Section 2.10, Table 3-2 and Table 3-7. This states that a self-contained wheel wash will be installed at every access point to be used by vehicles prior to exiting the Site onto the public highway, if there is mud or debris on the construction site. Section 2.11 states that all main waste streams, which will include wheel wash waste, will be separated and transported to an approved, licensed third party waste facility for recovery, recycling or disposal. The **OOEMP** (Doc Ref. 7.11 Rev 1) has been updated to include the potential use	**Update at Deadline 3: Resolved** There have been updates to the OOEMP (REP1-064) in section 2.9.6 and Table 3-2. We recommend this wording is included in Table 3-8: Hydrology and Flood Risk to reflect that there will be no discharge from wheel washes to the water environment.

Topic	Matter Raised	Applicant's Response	EA Response
	Vehicle and wheel washing is omitted from the OOEMP. The OOEMP should be updated to reflect relevant mitigation measures for any vehicle washing activities occurring during maintenance.	of wheel washes during the operational stage.	
EA40 Fuel, chemical and oil storage	Inadequate detail provided regarding storage and management of fuel, chemical and oils. Increased risk of fuels, chemical and oils entering the water environment and impacting on water quality. Fuel, chemical and oil storage must be covered to prevent rainfall accumulation. If necessary, a method to remove accumulated rainwater should be provided. They must be stored at least 10m from watercourses. Oil separators could also be used in drainage system. We note that WFD Report and ODEMP say about 110% capacity, but this is not included in the OCEMP or OOEMP, these should be updated so documents are	Within the **OCEMP** (Doc Ref. 7.10 Rev 2) Table 3-7, it is stated that in order to minimise the risk of leakage or accidental spillage of construction materials and potential pollutants on site: fuel and other potentially polluting chemicals will either be in self-bunded leak proof containers or stored in a secure impermeable and bunded area (minimum capacity of 110% of the capacity of the containers, which includes 10% more capacity than is needed. any plant, machinery or vehicles will be inspected before every use and maintained to ensure they	**Update at Deadline 3:** **On-going** We acknowledge that relevant guidance we requested has been added in Table 3-7 in OCEMP (REP1-062), Table 3-8 of OOEMP (REP1-064), section 5.17 - 5.21 of Appendix 11-1 Hydrology and Flood Risk Legislation, Policy and Guidance (REP1-045), and sections 4.2.5 and 4.2.6 of WFD Assessment (REP1-047). Information on fuel and other potentially polluting chemicals bunding also updated in Table 3-

Topic	Matter Raised	Applicant's Response	EA Response
	consistent. Fuel storage should comply with this guidance: Oil storage regulations for businesses - GOV.UK and Pollution prevention for businesses - GOV.UK	are in good working order and clean for use in a sensitive environment. This maintenance is to take place off-site if reasonably practicable or, if on-site, only at designated areas, such as the Site compounds. Only construction equipment and vehicles free of all oil/fuel leaks will be permitted on the Site. Drip trays will be placed below static mechanical plant. all refuelling, oiling and greasing of plant will take place above drip trays or on an impermeable surface which provides protection to underground strata and watercourses, and away from drains as far as reasonably practicable (and a minimum of 20 m). Vehicles will not be left unattended during refuelling. Additional details will be provided within the WMP post consent.	8 of OOEMP (REP1-064), now confirms the volume sizing. However, in neither OCEMP or OOEMP is there inclusion of covering or preventing rainfall accumulation. We also recommend that OCEMP wording is updated to include "If pollution is detected within the transformer bunds as part of routine inspections it will be suctioned to a self-bunded (or similar) tank and ultimately removed from site for suitable disposal by a licenced waste contractor", to be consistent with the OOEMP.

Topic	Matter Raised	Applicant's Response	EA Response
		The **OOEMP** (Doc Ref 7.11 Rev 1) states that the detailed OEMP(s) will include measures to manage the risk of pollution from any spillages and maintenance activities, such as correct storage in appropriately bunded areas of any hazardous materials and appropriate, regular inspection and maintenance of all equipment on-site.	
EA41 Substation impacts	Risk of pollution from fire affecting the substation is not recognised as a potential impact during operation. Electrical equipment at substations, specifically oil-filled transformers, pose a risk if they leak or a fire causes contamination of surface runoff Risk of pollution to surface waters The impact from pollution or fire risk from substations should be adequately identified, and relevant mitigation measures need to be considered.	Modern substations are designed in accordance with relevant UK standards and incorporate multiple layers of protection including electrical protection systems, fault detection, automatic isolation, fire separation distances, oil containment systems and routine inspection and maintenance. As set out within the **OOEMP** (Doc Ref. 7.11 Rev 1), the proposed substation layout would incorporate fire-resistant walls and a minimum separation distance of 10 m between the transformers as part of the	**Update at Deadline 3: Resolved** Updates in Table 3-8 OOEMP (REP1-064), Table 3-3 Appendix 11-2 Water Framework Directive Report (REP1-047), and sections 11.7.40, 11.7.44 and 11.8.51 of Chapter 11 Hydrology and Flood Risk (REP1-021).

Topic	Matter Raised	Applicant's Response	EA Response
	While penstocks are proposed to isolate any contaminated water associated with the BESS, it is unclear if this penstock can also be used to isolate the substation.	fire protection strategy to limit the potential for fire propagation between adjacent transformers. Consequently, the residual risk of a significant fire event is considered to be low. In the unlikely event of a fire, the electrical protection system would automatically disconnect the affected plant (e.g. transformer) from the network. Emergency services would be notified, where appropriate, and the site operator would implement the Emergency Response Plan, as set out within the **OOEMP** (Doc Ref. 7.11 Rev 1). The incident would be quickly attended to by the local Fire Brigade. However, it is expected that active firefighting would only occur if there is a danger to life. It is most likely that the fire will be allowed to burn out in a controlled manner. The 400kV and 3 no. 132kV substation sites are all lined, preventing any	

Topic	Matter Raised	Applicant's Response	EA Response
		infiltration of contaminated runoff. All substations except one of the 132kV sites (Parcel D) are also surrounded by flood bunds, which creates an opportunity to contain any contaminated runoff following an incident, but temporary measures would be implemented to contain and runoff at the substation in Parcel D if required, as set out within the **OOEMP** (Doc Ref. 7.11 Rev 1). Any oil cooled transformers will be above a bund that will, as a minimum, have a capacity of 110% of the total oil content of the transformer, which would minimise the risk of environmental contamination in the event of a fire. However, to ensure that any runoff from outside of this bund can be retained within the confines of the lined substation site, the drainage design will allow for it to be possible for the drainage from the substation site to be temporarily blocked if necessary. This may involve the use of temporary	

Topic	Matter Raised	Applicant's Response	EA Response
		inflatable pipe stoppers or other suitable measures to be defined in the Emergency Response Plan to plug the outfall pipe and retain any contaminated water within the substation site, from where it can ultimately be safely removed for appropriate offsite disposal. The necessary equipment to temporarily block the outfall will be retained and maintained on site should it be needed quickly. These measures have been included within the **OOEMP** (Doc Ref. 7.11 Rev 1) submitted at Deadline 1. Access arrangements would allow Fire and Rescue Services to respond safely, and any incident would be managed in accordance with the site's Emergency Response Plan and relevant Health and Safety procedures. **ES Appendix 11-4: Outline Drainage Strategy** [APP-227] includes surface water drainage from the 400kV On-Site	

Topic	Matter Raised	Applicant's Response	EA Response
		Substation into the same lined containment pond as the BESS Compound. A penstock, automatic with a manual override, can be closed to contain any runoff from a fire in this area. The detailed drainage strategy is secured pursuant to Requirement 10 of the dDCO. The **OOEMP** (Doc Ref. 7.11 Rev 1) has been updated at Deadline 1 to include the discussion above and to commit to removing firewater off site to a suitably licenced waste disposal site, even if found to be clean; no firewater runoff will be discharged to ground or to a nearby watercourse. Implementation of the measures contained in the OOEMP is secured through Requirement 11 of the dDCO. Paragraphs 11.7.37 to 11.7.41 have been added to **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) to reflect the management of contaminated runoff	

Topic	Matter Raised	Applicant's Response	EA Response
		from substations in the unlikely event of a significant fire.	
EA42 Transformers	There will be transformers, and other electrical equipment, associated with the solar stations, the 400 kV Substation, and the BESS, however bunding is unclear. Without bunding, transformers could leak or spill, and hydrocarbons could all pose an unacceptable risk to the water environment receptors. All transformers should be bunded for all phases of development. They will need to be suitable sized to contain 110% of the volume. Where they are exposed to rainwater, the Applicant must have a mechanism to remove accumulated rainwater regularly. This should be updated in APP -276 Outline Operational Environmental Management Plan and APP -	Where transformers and other electrical equipment are oil filled, these will comply with the Control of Pollution (Oil Storage) Regulations[8]. As such they would contain bunding to hold at least 110% of the maximum capacity of the transformer or other electrical equipment. If pollution is detected within the transformer bunds as part of routine inspections it will be suctioned to a self-bunded (or similar) tank and ultimately removed from site for suitable disposal by a licenced waste contractor. Table 3-7 in the **OCEMP** (Doc Ref 7.10 Rev 2) and Table 3-8 in the **OOEMP** (Doc Ref 7.11 Rev 1) states fuel and other potentially polluting chemicals will either	**Update at Deadline 3: Resolved** Updates in Table 3-8 OOEMP (REP1-064), Table 3-3 Appendix 11-2 Water Framework Directive Report (REP1-047), and sections 11.7.41 and 11.7.42 of Chapter 11 Hydrology and Flood Risk (REP1-021).

[8] HMSO (2001) The Control of Pollution (Oil Storage)(England)Regulations. Available at: https://www.legislation.gov.uk/uksi/2001/2954/contents [Accessed 25/08/2026]

Topic	Matter Raised	Applicant's Response	EA Response
	272 7.7 Environmental Mitigation and Commitments Register. We note that section 11.7.21 says that "bunding or a wall is not required" at the 132kV Substation as it lies outside of the flood extents, however, it should be clear that substation equipment will still need to be bunded to protect water quality in the event of a leak. Section 11.8.36 says that electrical equipment containing oils (e.g. transformers) will be self-bunded but this is not seen in the OOEMP or Commitments Register.	be in self-bunded leak proof containers or stored in a secure impermeable and bunded area (minimum capacity of 110% of the capacity of the containers, which includes 10% more capacity than is needed). Furthermore, the bunds under transformers will be routinely monitored and where oil contamination is suspected, the polluted water will be suctioned out for temporary storage in a self-bunded (or similar) tank before appropriate disposal off-site. Commitment HF-2 within the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) has been updated to include reference to the requirement for all oil-filled electrical equipment to be self-bunded with 110% storage capacity provided.	

Topic	Matter Raised	Applicant's Response	EA Response
EA43 Firewater testing prior to discharge	The documents suggest the runoff will be contained where it can be tested, but details of testing are unclear. BESS and substations are at risk from fire events, which can significantly reduce water quality if potentially contaminated water is not contained and disposed of. Applicant must commit to further details of firewater testing. We support that firewater will be captured and removed off site by a tanker to an accredited lab for testing or disposal. However, the Applicant should commit that firewater testing will be conducted in consultation with the Environment Agency. Sampling should use MCERTS approved methods, be sent to UKAS accredited laboratories and tested against list of hazardous substances (Environmental Quality Standards Directive (EQSD) list for WFD assessments - GOV.UK).	In **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), it is stated that firewater from BESS will be captured and tested prior to being removed off site for disposal and will not be discharged to controlled waters. Testing is to be sufficient to determine composition and to confirm appropriate disposal route. The reason for this is that the water is not expected to be suitable for discharge to controlled waters. Further detail has been provided in **OOEMP** (Doc Ref 7.11 Rev 1), including the commitment to use MCERTS approved methods, and UKAS approved laboratories in consultation with the Environment Agency. Paragraph 4.3.7 of the **OBSMP** [APP-284] states: “Fire water runoff may contain particles from a fire; in the unlikely event of fire water being discharged, the runoff will need to be contained so it can be sampled and tested by a UKAS accredited	**Update at Deadline 3: Resolved** Updates in Table 3-8 OOEMP (REP1-064), Table 3-3 Appendix 11-2 Water Framework Directive Report (REP1-047), section 4.3.7 of OBSMP (REP2-007) and section 11.7.39 of Chapter 11 Hydrology and Flood Risk (REP1-021).

Topic	Matter Raised	Applicant's Response	EA Response
		lab. The water contained by the valves will be tested and removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site." Paragraph 4.3.7 of the OBSMP [APP-284] will be amended for Deadline 2 to read as follows: Fire water runoff may contain particles from a fire; in the unlikely event of fire water being discharged, the runoff will need to be contained so it can be sampled and tested by a UKAS accredited lab. Firewater will be sampled by a suitably competent person and submitted to a UKAS accredited laboratory for analysis using UKAS and MCERTS accredited methods. The samples will be analysed to determine the presence and concentration of contaminants and checked against the hazardous	

Topic	Matter Raised	Applicant's Response	EA Response
		substances listed in the 'surface water pollution risk assessment for your environmental permit' guidance. The water contained by the valves will be removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site. A similar approach to water testing will be carried out should there be a fire at a substation, and this commitment has been added to Table 3-8 of **OOEMP** (Doc Ref 7.11 Rev 1).	
EA44 Emergency Response Plan	The Environment Agency is listed as a consultee for the development of the Emergency Response Plan (ERP) in the oCEMP, but this commitment is not carried through in the oOEMP or oBSMP. Increased risk of incidents and emergencies having a significant impact on the environment.	Paragraph 2.10.1 of **OOEMP** (Doc Ref 7.11 Rev 1) does already reference consultation with the EA for the development of the ERP. In addition, paragraph 1.2.2 of the **OBSMP** [APP-284] stipulates: "The design of the BESS and its impact are controlled in several ways. Prior to commencement of construction	**Update at Deadline 3: Resolved** Updates to section 4.4.1 of the OBSMP (REP2-007) and section 11.7.43 of Chapter 11 Hydrology and Flood Risk (REP1-021).

Topic	Matter Raised	Applicant's Response	EA Response
	The ERP should be developed in consultation with the Environment Agency in relation to responding to flood warnings and pollution events . The ERP should identify the importance of notifying any downstream river/groundwater abstractors in the event of a fire should impacts to surface water and/or groundwater occur, to ensure that Environment Agency incident response personnel are made aware of this as a priority. All relevant incident response parties should be made aware of the ERP and provided with immediate access to it.	of the BESS, a BSMP (in accordance with the OBSMP) is required to be submitted to the relevant local planning authority and approved, in consultation with Lincolnshire Fire and Rescue Service (LFR) and the Environment Agency (EA). The Applicant must operate the BESS in accordance with the approved plan." The Applicant will amend Section 4.4.1 of the OBSMP [APP-284] for Deadline 2 to incorporate the following text: The BESS Site will have a robust and validated emergency response plan (ERP), developed in consultation with LFR. Where an incident has the potential to affect surface water or groundwater, the ERP will include priority notification and escalation procedures for the Environment Agency (EA) and, where applicable, downstream receptors such as licensed abstractors. All relevant incident response parties, including the	

Topic	Matter Raised	Applicant's Response	EA Response
		EA, the lead local flood authority and the site operator, will be made aware of the ERP and will have immediate access to it. Notification procedures will be activated at the earliest practicable stage of any incident with the potential to affect controlled waters. Requirement 6 of the **Draft DCO** (Doc Ref 3.1 Rev 2) also requires the relevant planning authority to consult with Lincolnshire Fire and Rescue and the Environment Agency before determining an application for the approval of the battery safety management plan.	
Minor errors and points for consideration			
ES Chapter 11: Hydrology and Flood Risk	Detailed comments on ES Chapter 11: Hydrology and Flood Risk [APP-062]	The Applicant has made corrections to **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) in accordance with the comments raised.	

Topic	Matter Raised	Applicant's Response	EA Response
ES Appendix 11-3: Flood Risk Assessment	Detailed comments on ES Appendix 11-3: Flood Risk Assessment [APP-222]	The Applicant has made corrections to the **FRA** (Doc Ref. 6.3 Rev 2) in accordance with the comments raised.	
Hydraulic modelling	The overall approach on hydraulic modelling is considered reasonable, however, detailed comments are due to be provided.	The Applicant is in the process of discussing detailed comments received from the EA on the hydraulic modelling.	
PFAS in solar panels.	We strongly recommend that all solar panels are PFAS-free. Some solar panels are treated with a PFAS coating. If panels containing PFAS are used, we suggest that there is consideration of this in the OEMP and DEMP. For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal. The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via 'thermal shock' such as if cleaned whilst at a high	The Applicant has updated the **OOEMP** (Doc Ref. 7.11 Rev 1) to commit to no PFAS coatings to be used on the PV modules. Therefore mitigation for PFAS is no longer included within the **OOEMP** (Doc Ref 7.11 Rev 1), within Table 3-8. The requirement for no washing of panels within periods of high temperature or prolonged sunlight has been added to the **OOEMP** (Doc Ref 7.11 Rev 1).	

Topic	Matter Raised	Applicant's Response	EA Response
	temperature due to prolonged exposure to sunlight.		
Guidance	The guidance section for hydrology assessment is missing relevant information. Additional guidance is listed.	The guidance and best practice documents listed by the EA have been included within ES **Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), **ES Appendix 11-1: Hydrology and Flood Risk Legislation, Policy and Guidance** (Doc Ref. 6.3 Rev 1), **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref 7.11 Rev 1), **ODEMP** (Doc Ref. 7.12 Rev 1), **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1), where appropriate.	
Flocculants	The water management plan should include further details of flocculants to be used in the treatment of water. Chemicals used as flocculants can impact water quality if used incorrectly or in wrong quantities.	Flocculants are only mentioned to be used if absolutely necessary and with appropriate approvals from the EA. If during construction, there is a need to use chemical dosing to manage fine sediment in runoff, then as a last resort, a specialist contractor would be involved and the EA	

Topic	Matter Raised	Applicant's Response	EA Response
		consulted. This is referenced in **OCEMP** (Doc Ref. 7.10 Rev 2).	
Installation of drainage	Chronologies of the construction programme are unknown at this stage, but it is unclear if drainage and firewater isolation would be completed prior to BESS and Substation construction. Without installing relevant impermeable lining, SuDS and shutoff valves prior to constructing the BESS or Substations, there is a risk that in the event of a fire or pollution event any contaminated water will not be adequately isolated. Applicant should commit to installing suitable drainage prior to other installations. Sections 2.10.5 on construct BESS activities and 2.10.6 on constructing substations should include relevant drainage construction.	Construction of drainage and impermeable lining below structures forms part of the earthworks phase prior to the installation of any electrical equipment or BESS. As such, permanent drainage arrangements would be in place prior to the installation of equipment that poses fire or contamination risks.	
Inspection and	Table 3-7 of OCEMP says “Field drainage systems will be maintained during construction”, and Table 3-8 of OOEMP says “regular inspection and maintenance	**OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and the **Environmental Mitigation and**	

Topic	Matter Raised	Applicant's Response	EA Response
maintenance	of Applicant owned drainage systems", but it does not specify a maintenance schedule. Frequency of this inspection is unclear. We support that the ODS says there will be a "A programme of inspection and maintenance will be designed by the contractor", however this maintenance schedule should be referred to in the commitments register, OCEMP and OOEMP too.	**Commitments Register** (Doc Ref 7.7 Rev 1) have been updated to refer to a programme of maintenance and inspection being implemented for on-site drainage.	
Water Management Plan	The WMP is referenced in Commitment HF-1 'Good Practice Environmental Management Measures During Construction', but should also be included in HF2 'Good Practice Environmental Management Measures During Operation'. oOEMP Table 3-6 does not include the WMP or any monitoring details.	As explained under EA34, a detailed WMP is to be prepared for the mitigation and monitoring of impacts during the construction stage (and for a short period post-construction). Good practice measures to minimise risks to the water environment during the operational phase are set out within Table 3-8 of **OOEMP** (Doc Ref. 7.11 Rev 1), however, no separate WMP is proposed.	

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Outline Drainage Strategy	We support that the ODS section 5.10.2 describes the swale and how any gravel or soil will be managed after a fire event, however this detail should also be contained within the OBSMP and included in the Commitments Register for consistency.	The Applicant notes the Council's comments and agrees that, for consistency, the relevant detail in paragraph 5.10.2 of **ES Appendix 11-4: Outline Drainage Strategy** [APP-227] and the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) regarding the management of gravel and soil following a fire event should also be reflected within the **OBSMP** [APP-284] . The OBSMP will therefore be updated accordingly at Deadline 2.	
Water supply	Section 11.4.33 says "90 litres per day" as the supply of water at the construction compounds (industrial standard for industrial use). Whereas 11.4.36 says "based on the industry standard of 90 litres per person". For clarity, we recommend a minor edit to 11.4.33 to state the intended water use as 90 litres per person per day.	Paragraph 11.4.33 in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated to state the intended water use as 90 litres per person per day.	Discussion is ongoing as a basic water supply strategy is undertaken. A meeting on 28/09/2026 confirmed some quantities and made us aware of some water uses not already apparent (landscaping), however supply options also need to be

Topic	Matter Raised	Applicant's Response	EA Response
			better defined to provide confidence that the typical and peak water demands can be met. Advice provided recommended a multiple source approach of different sources of supply to provide contingency should any become unviable as the project develops and an application to Anglian Water Services should help to clarify the extent of quantities potentially available from them. The possibility of a deminimus groundwater abstraction (<20m3/day) was also raised. Advice from the EA in the meeting was that further assessment would be expected to evaluate quantitative impacts on other abstractions, lawful users and

Topic	Matter Raised	Applicant's Response	EA Response
			water features. However, on review of our position on unregulated abstractions, these assessments are not normally required, and it would not therefore be consistent to request them as part of the planning process either. This option may be more viable to the applicant as a result therefore as part of the supply options available.