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The Planning Inspectorate

**Our ref:** XA/2025/100254/02-L01  
**Interested Party No.** FA0BE702C  
**Your ref:** EN010170  
**Date:** 07 November 2025

Via email to:  
greenhill@planninginspectorate.gov.uk

To Whom It May Concern,

**Environment Agency responses to The Examining Authority's first written questions (ExQ1).**

Thank you for consulting us on the Examining Authority's first written questions and requests for information (ExQ1). We provide our responses in Appendix 1.

Yours faithfully

**Paul Gethins**  
**Planning Specialist – National Infrastructure Team**

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**Appendix 1** – Environment Agency's response to first written questions (ExQ1)

## **Appendix 1 – Environment Agency’s response to first written questions (ExQ1)**

### **Q8.0.9 - Check valves and fire safety**

The Environment Agency requests (RR-1224, EA/WQ/02) that it is made clear in the documents that any check valves would be closed automatically in the event of a battery system fire. The Outline Battery Storage Safety Management Plan [APP-551] at 5.3.2 Page 32 states that in the event of a fire a system of automatically self-actuating valves would be closed and the Flood Risk Assessment and Drainage Strategy states the same [APP-103] at 2.8.3. Both of these documents would be secured by requirement and certified. Does this resolve the EA's concerns regarding the check valves?

<b>Comment</b>
Whilst we accept the use of “self-actuating valves” in principle, we require further information in the supporting documents of how they will operate. For example, will they be set in the close position when fire suppression systems are activated. There must also be safeguards to ensure there is a back-up option in case of a power failure, either with a manual close or a default shut position.

### **Q21.0.7 - Climate change allowance**

Tables 2 and 3 in appendix 10.1 of the Flood Risk Assessment [APP-097] set out the climate change allowances applied to the FRA, including from the 2080s epoch. The climate allowances from the 2080s epoch would still be relevant to the to the assessment should the proposed development commence operation in 2029 and be decommissioned after a maximum 60 years in 2089. Please confirm that you are content with the climate change allowance epoch used given that proposed development is predicted to operate until 2089.

<b>Comment</b>
The applicant has used the correct climate change allowances in their assessment of flood risk to the development site.
The applicant has used the higher central and upper allowances for the 2080s epoch. The 2080s epoch covers a period from 2070 to 2125 so is commensurate with the lifetime of the development. Many of the proposed solar panel areas (A through to G) are located within Flood Zone 1 or small areas of Flood Zone 2 and 3. In these locations the applicant has used the Environment Agency’s Risk of Flooding from Surface Water mapping as a proxy for fluvial flood risk but has also undertaken supplementary analysis calculating water levels using the Mannings open channel flow equation applying the 2080s epoch upper climate change allowance flows to determine water levels.

We consider this assessment reasonable and proportionate to the level of risk for the solar panel areas. In terms of the Battery Energy Storage System (BESS) as described within Appendix 10.11: Annex J – Flood Risk Assessment and Drainage Strategy – Green Hill BESS (APP-108), the applicant has undertaken detailed hydraulic modelling of the River Nene, Grendon Brook and tributaries, and the Field Drain which is an Ordinary Watercourse which runs through the BESS site. The application of climate change to these models reflects the 2080s epoch higher central and upper allowances and aligns with guidance.

**Q21.0.8 - Climate change allowance**

Paragraph 2.4.1 of appendix 10.1 of the Flood Risk Assessment [APP-097] references the EA's 'Flood Risk Assessments: Climate Change Allowances' guidance. Please confirm that you agree with the climate change allowance provided.

**Comment**

The Flood Risk Assessment Climate Change allowances guidance referenced in the Flood Risk Assessment available online at [Flood risk assessments: climate change allowances - GOV.UK](#) is the correct guidance to use. We agree that the applicant has used this guidance appropriately within their assessment