

The Planning Inspectorate

Our ref: XA/2025/100501/01
Interested Party No. FA0BE702C
Your ref: EN010170
Date: 17 December 2025

Via email to:
greenhill@planninginspectorate.gov.uk

To Whom It May Concern,

Green Hill Solar Farm – Examination Deadline 3

Environment Agency responses to The Examining Authority's Second Written Questions (ExQ2)

Thank you for consulting us on the Examining Authority's second written questions and requests for information (ExQ2). We provide our responses in Appendix 1. The Environment Agency's current position on this DCO is summarised in Appendix 2.

Environment Agency update on disapplication request

We are currently undertaking our review of the Applicant's request to disapply Flood Risk Activity Permits (FRAP) under the Environmental Permitting (England and Wales) Regulations 2016 for the proposed development. We endeavour to provide our formal position on this matter as soon as possible and are confident a decision will be provided prior to the end of Examination. If the request to disapply FRAP is accepted, Protective Provisions in favour of the Environment Agency will be required in the DCO.

Yours faithfully,

Siobhan Martin
Planning Advisor – National Infrastructure team
Email: NITeam@environment-agency.gov.uk

**Appendix 1 – Environment Agency’s response to The Examining Authority’s
Second Written Questions (ExQ2)**

Appendix 2 – Summary of Environment Agency Position

Appendix 1 – Environment Agency’s response to The Examining Authority’s Second Written Questions (ExQ2)

Q2.17.1 Environment Agency updated flood mapping dataset

Do you wish to comment on any implications for the scheme of the Environment Agency’s NaFRA2 updated flood mapping dataset, released 25 March 2025?

Comment
<p>We are satisfied that the publication of NaFRA2 will have no material impact on the assessment of flood risk that the Applicant has undertaken to date.</p> <p>There are some minor changes in flood extent that have arisen in the updated Flood Map for Planning published in March 2025. In some locations, particularly in the vicinity of Grendon and the proposed Battery Energy Storage System (BESS) location the extent of the updated Flood Map for Planning (March 2025) is slightly reduced when compared to the previous Flood Map for Planning. To the northwest of the River Nene there are some slight increases in extent shown in the new Flood Map for Planning dataset (March 2025) when compared to the previous Flood Map for Planning, but these increases are generally aligned to the small Ordinary Watercourses which bisect the Order limits. The Applicant has undertaken their own site-specific hydraulic modelling for the River Nene, Grendon Brook, and Field Drain which run near the BESS site. This site-specific hydraulic modelling should be used in preference to the outputs from NaFRA2. Additionally, the Applicant has undertaken supplementary analysis of the flood risk from smaller Ordinary Watercourses calculating levels based on the 2080s epoch upper climate change allowance. This should also be used in preference to the NaFRA2 outputs on the basis that it is more precautionary.</p>

Q2.17.3 Flood Risk

Please explain whether the Environment Agency (EA) considers the applicant’s proposed approach to the EA’s concerns regarding hydraulic modelling (EA-016 of the Applicant’s Response to Relevant Representations [REP1-161]) to be sufficient.

Comment
<p>We broadly agree with the modelling approach taken and note that the Applicant has undertaken additional sensitivity testing within the respective models and provided further details with respect to the Station Road culvert dimensions on the Field Drain; this is welcomed. We have one outstanding concern with respect to hydraulic modelling undertaken for the middle River Nene. We appreciate the Applicant has undertaken sensitivity testing which is welcomed. The Applicant should present the mapped outputs of the sensitivity testing for the middle River Nene in relation to the BESS within the Flood Risk Assessment (FRA). This is important because the Applicant’s updated hydraulic modelling for the middle River</p>

Nene shows a reduction in flood extent when compared to the existing Environment Agency hydraulic model outputs. We need to be confident that the BESS is not at flood risk from the River Nene during the design flood event.

Appendix 2 – Summary of Environment Agency Position

Subject	Work package	Baseline assessment / scope / surveys	Impact	Solution	Requirement	Status	EA Rel Reps ref no:
Ecology	Environmental Statement						EA/FBG/01, EA/FBG/03
	Outline Ecological Protection and Mitigation Strategy						EA/FBG/02
	Water Framework Directive Assessment						EA/FBG/04
Water Resources	Water Supply Strategy						EA/WR/01
Flood Risk	Flood Risk Assessment and Drainage Strategy						EA/FR/01, EA/FR/02, EA/FR/03, EA/FR/04, EA/FR/05, EA/FR/06
Surface and Ground Water Quality	Outline Construction Environmental Management Plan				Requested to be included as consultee in Requirement 13		EA/WQ/11
	Outline Operational Environmental Management Plan				Requested to be included as consultee in Requirement 14		EA/WQ/08, EA/WQ/09

	Decommissioning and Restoration				Requested to be included as consultee in Requirement 21	
	Outline Battery Safety Management Plan					EA/WQ/01, EA/WQ/02, EA/WQ/03, EA/WQ/08, EA/WQ/09
	Foul Water Disposal Strategy				Requested to be included as consultee in Requirement 11	EA/WQ/04
	Environmental Statement					EA/WQ/05, EA/WQ/06, EA/WQ/07, EA/WQ/08, EA/WQ/09, EA/WQ/10, EA/WQ/11, EA/WQ/12, EA/WQ/13
	Water Framework Directive Assessment					EA/WQ/14
	Drainage Strategy					EA/WQ/08, EA/WQ/09

	Preliminary Risk Assessment for panel areas and BESS						EA/WQ/15
	Discovery Strategy						EA/WQ/11
Permitting	Flood Risk Activity Permit (FRAP)						EA/FR/07

