

Planning Inspectorate
National Infrastructure Planning
Temple Quay House (2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: [REDACTED]
Your ref: EN0110013
Date: 01 June 2026

Dear Sir/Madam

The Drovers Solar Farm the Examining Authority's written questions and requests for information

We have reviewed the Examining Authority's (ExA) First Written Questions (dated 13 May 2026) and our comments are provided in the table appended to this letter.

Yours faithfully

[REDACTED]
Planning Specialist
Contact: NIteam@environment-agency.gov.uk

ExQ1	Question to:	Question:	
8. Flood risk, hydrology and water resources			Environment Agency Comment
Q8.0.3	Environment Agency (EA)	<p>Water Framework Directive assessment for groundwater bodies</p> <p>In reference to paragraphs 5.16.2 and 5.16.14 of NPS EN-1, could the EA confirm whether it agrees with the conclusions of the WFD assessment [APP-171]? In particular, the ExA seeks confirmation as to whether comments made in the EA's RR [AS-062] regards the adequacy of the applicant's characterisation of groundwater levels and flow direction within Chapter 12 of the ES would have implications for the findings of the WFD assessment for groundwater bodies.</p>	<p>At Relevant Representations stage [AS-062] we submitted several comments regarding concerns about the adequacy of the Applicant's hydrogeological model (refs. EA04, EA18, EA19, EA20, EA22 and EA23).</p> <p>Following Issue Specific Hearing 1, in correspondence with the Applicant, we have requested the Applicant produces a technical note summarising their review of groundwater model data provided by the Environment Agency and any implications for their hydrogeological model for the Proposed Development. The Applicant proposed to update Chapter 12: Water Resources at Deadline 2 to compare the North East Anglia Chalk model results (wet day) with the groundwater elevations derived for the triangulation analysis used in the Environmental Statement. We find this approach acceptable, and look forward to reviewing the updated document.</p> <p>Provided that adequate post-consent ground investigation and monitoring are secured via the Development Consent Order, if groundwater levels are found to interact with the proposed BESS and/or Substation foundation extents, and based on the proposed mitigation measures set out in APP-171 Table 12-4 and secured via the outline Construction Environment Management Plan (CEMP), we concur that any significant risks posed to the WFD Groundwater body by these construction activities can be adequately mitigated.</p> <p>The Applicant also indicates in APP-171 Table 12-4 that impacts from Horizontal Directional Drilling (HDD), if required, can be mitigated in part by carrying out these works when groundwater levels are not within 15m of ground level. We seek assurance from the Applicant that should post-consent monitoring demonstrate that interaction of HDD with groundwater is unavoidable, potentially significant effects on the WFD Groundwater body can be mitigated with an alternative approach.</p>
Q8.0.4	Environment Agency (EA)	<p>Flood Risk Assessment (FRA)</p> <p>The ExA notes that BDC's RR [RR-011] defers to NCC and EA on matters of water resources and flood risk.</p> <p>Regarding the updated ES Appendix 12.2: Flood Risk Assessment [AS-053], does the EA agree with the conclusions in Section 12.6 and the rationale for the section on the sequential test, application of the sequential approach and the exception test (paragraphs 12.2.44 to 12.2.55)?</p>	<p>The application and adequacy of the Sequential Test sits under the remit of the Local Planning Authority. However, we note that the site lies almost entirely within Flood Zone 1, and development will be at low risk of flooding from rivers and sea. There is a small section of the site under work no.11 – to be used for Skylark plots - which falls within flood zones 2 and 3. It is also acknowledged that flood risk has been considered in the site selection process. Given these details, we consider the conclusions on the Sequential and Exception Tests within the submitted FRA to be acceptable.</p> <p>We have made separate comments relating to flood mitigation at the BESS within the site (EA12), where infrastructure is proposed to be raised in mitigation of potential surface water flood risk impacts. The applicant has made commitments within their first draft of the Statement of Common Ground to</p>

ExQ1	Question to:	Question:
		ensure that surface water flooding will be managed appropriately to avoid and manage risk to the BESS areas.