

Planning Inspectorate,
Temple Quay House, 2 The Square
Temple Quay
Bristol
BS1 6PN



Reference: [REDACTED]
Customer reference: EN0110013

01 June 2026

Dear sir/madam

Written submission regarding project team's comments in Issue Specific Hearing 1, their groundwater model and a model sent by the Environment Agency

The Drovers Solar Farm

This is our written representation in response to Action Points from Issue Specific Hearing 1 (see [here](#)).

Within our relevant representation ([AS-062/RR-021](#)), we raised concerns regarding the accuracy of the hydrogeological model. In summary, our key issue was that the low resolution of the hydrogeological model may contradict other lines of

Evidence. The implication of this is that interactions with groundwater may not be fully understood. We advised that the Applicant could submit an Environmental Information Request to the Environment Agency, to check for any other hydrology monitoring stations within the Study Area and the Environment Agency's North East Anglia Chalk model. Both approaches would help to inform and check the Applicant's hydrogeological site conceptual model.

During the Issue Specific Hearing 1 (07 May 2026), the project team stated that they had reviewed the North East Anglia Chalk model, and considered it to be less conservative than their current hydrogeological site conceptual model.

Following Issue Specific Hearing 1, in correspondence with the Applicant, we have requested that 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 found this approach acceptable, and look forward to reviewing the updated document.

In the absence of site-specific data, even if the Applicant can demonstrate that their own model is more conservative than the North East Anglia Chalk Model, uncertainties will remain which would have to be addressed by post-consent monitoring and design mitigation as required. We will seek assurance via appropriate commitments, secured under the Development Consent Order, that the Applicant will carry out sufficient ground investigation and monitoring post-consent. This should ensure that they are able to suitably refine their ground model and mitigate any risks should groundwater rest levels be shallower than anticipated.

Yours sincerely,

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