

Planning Inspectorate

Reference: OR-0010831/01

Customer reference: EN0110013

25 August 2026

Deadline 3 submissions - EA 04 follow up response

The Drovers Solar Farm

Dear Planning Inspectorate,

Following our response letter OR-0009338/01, sent on 24 August 2026, we wish to provide an update regarding issue reference EA04. At the time, we were awaiting comments from our Area Groundwater Officer. We have now received these comments and have provided an update below.

EA04 (Groundwater Flow Direction)

We are satisfied and consider this issue resolved.

We were concerned that the groundwater flow direction shown in figures 12.7 to 12.16 may be inaccurate. We advised that the claims made in sections 12.6.37 and 12.6.38 of 6.2 Environmental Statement Chapter 12: Water Resources [APP-061] should be revised, supported by new evidence.

The North-East Anglian Chalk (NEAC) Groundwater Model outputs are an improvement on those derived from interpolating between borehole levels measurements supplied previously. The 6.3.1 ES Figure 12.10 Groundwater Flow Directions from NEAC Groundwater Model [\[REP3-041\]](#) shows general horizontal groundwater flow across the site. This will give the Applicant a better conceptualisation to assess flow pathways for potentially polluting substances used in construction/operation, and the potential impacts sub-surface works may have to the local hydrogeological regime. Therefore, we are content to resolve this issue.

We have taken note of a number of issues with the model however. We have mentioned these below.

The map shown within Figure 12.10 does appear to be the dry weather scenario output for the Chalk top layer (layer 5 of the model), rather than the wet Scenario

referenced in 12.6.44 of 6.2.2 ES Chapter 12 Water Resources (Tracked) [\[REP3-037\]](#).

The figure linked below 6.3.1 ES Figure 12.9 Depth to NEAC Groundwater Wet Conditions [\[REP3-050\]](#) is not a NEAC model output (even though it is titled so). It is similar to the original 6.3 Environmental Statement Figure 12.9 Maximum Static Groundwater Level Depths within CSA [\[APP-123\]](#), although with levels calculated to be slightly higher to the north of the CSA than in the original figure. For the purposes of the Environmental Statement, this is sufficient, although the title of this figure should be changed to reflect where the information is derived from.

Section 12.6.43 of Chapter 12 Water Resources states that the NEAC groundwater model is based on TUFLOW 5, not MODFLOW 5.

The new figure 12.10 does show the correct direction, even though it is incorrectly labelled. Considering the Applicant is committed to groundwater monitoring in the 7.6.3 outline Construction Environmental Management Plan (Tracked) [\[REP3-074\]](#), (table 6) this should be sufficient to mitigate risks to groundwater, now that the conceptualisation of groundwater is generally correct.

We recommend the following corrections:

- To either change the references to Figure 12.10 to the correct scenario (ie. Wet to Dry) or add the correct figure if available;
- Change reference to the groundwater model used to create the bespoke NEAC groundwater model (ie. TUFLOW 5 to MODFLOW 5)
- Correct the source for data used in Figure 12.9.

Summary of our position

Relevant Rep Reference	Deadline 4
EA01 (Source Protection Zone)	Resolved
EA02 (Drinking Water Protected Area)	Resolved
EA03 (3D Representation of Groundwater)	Resolved
EA04 (Groundwater Flow Direction)	Resolved
EA05 (Maximum Foundation Extents)	Resolved
EA06 (Avoidance of Pipelines)	Resolved
EA07 (Environmental Legislation)	Resolved
EA08 (Watercourse Buffers)	Resolved
EA09 (Otter and Water Vole)	Resolved

EA10 (Invasive Non-Native Species)	Resolved
EA11 (Waste Classification)	Resolved
EA12 (Flood Risk – BESS)	Resolved
EA13 (Sensitivity Criteria for Receptors)	Resolved
EA14 (Private Water Supplies)	Resolved
EA15 (Chalk Rivers)	Resolved
EA16 (Abstraction Licence)	Resolved
EA17 (WFD Groundwater Bodies)	Resolved
EA18 (Groundwater Levels)	Resolved
EA19 (Accuracy of Hydrogeological Model)	Resolved
EA20 (Boreholes)	Resolved
EA21 (Trenchless Installation Methods)	Resolved
EA22 (Shallow Groundwater)	Resolved
EA23 (Interaction with Groundwater)	Resolved
EA24 (Foundation Work Risk Assessment)	Resolved
EA25 (Construction Mitigation Measures)	Resolved
EA26 (Drilling Fluid Breakout Plan)	Resolved
EA27 (Hydrogeological Impact Assessment)	Resolved
EA28 (Spills and Leaks)	Resolved
EA29 (Unexpected Contamination)	Resolved
EA30 (Contaminated Soils)	Resolved
EA31 Removal of buried cables	Not resolved
EA32 (Drainage System)	Resolved
EA33 (BESS Mitigation Measures)	Resolved
EA34 (Penstock Valve)	Resolved
EA35 (Removal of Captured Firefighting Water)	Resolved
EA36 (Underground Contaminated Water Tanks)	Not resolved
EA37 (Spills and Leaks – BESS and Substation Drainage Systems)	Resolved
EA38 (Storage of Waste Batteries)	Resolved
EA39 (Fire Suppressant Chemicals)	Resolved
EA40 (Spacing of BESS)	Resolved
EA41 (Thermal Effects of Buried Cables)	Resolved
EA42 (Missing Legislation)	Resolved
EA43 (Use of Concrete)	Resolved
EA44 (Wheel Washing Facilities)	Resolved
EA45 (Water Quality Monitoring)	Resolved

EA46 (Environment Agency Protective Provisions)	Not resolved
EA47 (Requirement wording)	Not resolved
EA48 (Permitted Preliminary Works)	Not resolved
EA49 (Requirement 13 – Construction Environmental Management Plan)	Resolved
EA50 (Requirement 14 – Operational Environmental Management Plan)	Resolved
EA51 (Dedicated Contaminated Water Tanks)	Resolved

If you have any questions regarding our response, please contact
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Yours sincerely,



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