



**HELIOS** RENEWABLE  
ENERGY  
PROJECT

**PINS Document Number:**  
EN010140/APP/6.3.9.3

**Pursuant to:**  
APFP Regulation 5(2)(a)

**Environmental Statement  
Appendix 9.3:  
EA Consultation**

June 2024

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Helios Renewable Energy Project - WFD assessment  
**Date:** 09 May 2024 16:42:18

---

Hi Liz and Lizzie,

Thanks for your time this afternoon in our PM call.

As discussed, we want to clarify our position on the need for a standalone Water Framework Directive (WFD) assessment for Helios.

The baseline conditions of WFD waterbodies in the vicinity of the Site will be assessed in our ES Chapter. The site boundary does not overlap any surface water WFD waterbodies and therefore there are no direct effects on these surface water WFD waterbodies have been identified, as a result of the Proposed Development. The ES Chapter considers the effect of the Proposed Development on water quality and through the appropriate management and design mitigation measures (predominately in the oCEMP), the effect on water quality (and any indirect effect on water quality downstream of the site) are mitigated and risk of a pollution event reduced.

As we noted, the requirement for a standalone WFD assessment was not raised in the EA's s42 consultation response late last year.

Can you please confirm the EA is comfortable with our position on the need to not prepare a separate WFD assessment.

Thanks and happy to discuss,

Jordan

### Jordan Green

Associate - Infrastructure Planning

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Mobile: [REDACTED]  
[REDACTED]@stantec.com

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London W1D 3QB



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## Mark Skivington

---

**From:** Green, Jordan <[REDACTED]@stantec.com>  
**Sent:** 01 May 2024 09:48  
**To:** [REDACTED]  
**Subject:** FW: Helios - Position on Sensitivity Testing/Maximum Credible Scenario

Hi all,

Please see the below from the EA regarding sensitivity testing.

What implications does this have for our work?

Jordan

---

**From:** Locke, Liz [REDACTED]@environment-agency.gov.uk>  
**Sent:** Tuesday, April 30, 2024 5:50 PM  
**To:** Green, Jordan [REDACTED]@stantec.com>  
**Subject:** RE: Helios - Position on Sensitivity Testing/Maximum Credible Scenario

Hi Jordan

I can now confirm the EA's position regarding sensitivity testing. We consider that the proposals should be subject to sensitivity testing against a Credible Maximum Scenario of the H++ scenario. Please run the H++ scenario as a sensitivity test within the hydraulic model so that the impacts of extreme sea level rise can be understood. The H++ level can be obtained from the HEWL (2020) model for the 2070's and applied to the hydraulic model. This can be used instead of the standard 1.9m generally applied.

We consider this position is consistent with the relevant National Policy Statement for Energy EN1. It is consistent with the approach we are taking for all new NSIP essential infrastructure development.

Please let me know if you have any queries.

Regards,

Liz

**Liz Locke**

Planning Specialist, National Infrastructure Team

**Environment Agency**

[REDACTED]@environment-agency.gov.uk

Mobile: [REDACTED]

Team mailbox: [REDACTED]@environment-agency.gov.uk

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[REDACTED]

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**From:** Green, Jordan [REDACTED]@stantec.com>  
**Sent:** Wednesday, April 24, 2024 5:19 PM  
**To:** Locke, Liz [REDACTED]@environment-agency.gov.uk>

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Fwd: Helios renewable energy project: model review comments 11-04-24  
**Date:** 19 April 2024 06:13:52  
**Attachments:** [YOR\\_Helios\\_Solar\\_Farm\\_110424.xlsm](#)  
[Untitled attachment 00045.htm](#)

---

Model review comments

Begin forwarded message:

**From:** Chris Cameron-Hann <[REDACTED]@aegaea.com>  
**Date:** 11 April 2024 at 13:52:19 BST  
**To:** Alex Brennan [REDACTED]@aegaea.com>, Lauren Norman [REDACTED]@aegaea.com>  
**Subject:** Fwd: Helios renewable energy project: model review comments 11-04-24

Begin forwarded message:

**From:** "Sale, Philip" <[REDACTED]e@environment-agency.gov.uk>  
**Date:** 11 April 2024 at 12:02:20 BST  
**To:** Chris Cameron-Hann [REDACTED]@aegaea.com>  
**Cc:** "Locke, Liz" [REDACTED]e@environment-agency.gov.uk>  
**Subject:** Helios renewable energy project: model review comments 11-04-24

Hi Chris,

Please find the attached final model review comments for the baseline modelling.

There are some areas for further consideration within the hydraulic model, particularly with regards to the application of flow, initial water levels within the river channels and bend losses, and downstream boundary conditions. I have summarised the key review comments below, but the attached spreadsheet provides further details on each comment.

**Key model review comments**

1. Please consider the floodplain flow from the River Aire and River Ouse at the upstream end of the model domain as it appears that this is not represented within the model. **(raised in interim comments 02-04-24)**
2. Please add detail to the reporting regarding the omission

of inflows for the River Trent, Don, and Derwent. The Ouse (2018) model includes inflow boundary data for the Derwent so it would be useful to know why this has been omitted from the model given the influence it could have on water levels in the Lower Ouse. (raised in interim comments 02-04-24)

3. Please review and update the water levels within the tidal boundary condition CSV dataset 2071\_M\_T\_003.csv. The low water levels are considerably lower than those within the HEWL (2020) modelling. This could have implications on the rate at which the Ouse is able to discharge into the Humber. (raised in interim comments 02-04-24)
4. Please evaluate the initial conditions within the model as the final values reflected within the Initial Condition Check file and within the stage time series appear quite simplistic and do not align with the initial conditions within the Aire (JBA, 2017) and Ouse (Mott Macdonald, 2018) hydraulic models
5. It would be worthwhile adding form losses or increasing mannings roughness within ESTRY cross sections at bends as this could have some influence on out of bank flooding.
6. Please evaluate embankment levels on the left bank of the River Ouse near to Mulberry Farm. Are these accurate as they appear to be around 0.5 metres higher than previous modelling and 1 metre resolution composite Lidar DTM data.
7. Please evaluate the culverts which have no width or height data associated with them. Is this correct? Are these locations where there is a cut in the digital terrain model or where flooding does not reach? It would be useful if a table could be added to the technical note which lists the dimensions and invert levels of these floodplain culverts along with the data source, for example survey, assumed from Lidar etc.
8. Please double check bank elevations around Haddlesey Flood Gate on the left bank of the River Aire (457072, 426415) as based on a review of 1d-2d check cell elevations in the model these could be underestimated
9. Please consider adding 2d\_mat\_ENSO\_HUMBER\_001\_R to the tuflow geometry control file as it appears this is not being used which is resulting in the lower portion of the model domain having a floodplain roughness of 0.04 in its entirety.
10. Please review the messages file and specifically warning 2118.

#### **Other comments**

11. Please test the H++ scenario within the model and report on the implications for the development site, for example do the solar panels remain operational in such a scenario. Does the proposed substation remain dry etc.
12. Are we confident that the model is replicating hydraulic

processes when compared to previously calibrated models and historic data? It would be useful if some checks could be undertaken on this and commentary provided in the technical note once other comments highlighted within this review have been addressed.

13. Once the model has been finalised it would be useful if detail on sensitivity tests could be included within the modelling technical note

Let me let me know if you need any further information or clarification on anything. Happy to discuss further if you need.

Kind regards,

Phil

**Phil Sale**

**Modelling Specialist – National Infrastructure Team**

**Environment Agency** | Trentside Office, Scarrington Road,  
Nottingham, NG2 5BR

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**Incident management standby role:** Monitoring and Forecasting Duty Officer (MFDO) – West and East Midlands

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## Mark Skivington

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**From:** Sale, Philip <[REDACTED]@environment-agency.gov.uk>  
**Sent:** 03 April 2024 12:44  
**To:** [REDACTED]  
**Subject:** RE: Helios renewable energy project: Tuflow log files

Thanks Chris. I can confirm the log files have uploaded.

Phil

---

**From:** Chris Cameron-Hann [REDACTED]@aegaea.com>  
**Sent:** Wednesday, April 3, 2024 11:28 AM  
**To:** Sale, Philip [REDACTED]@environment-agency.gov.uk>  
**Cc:** Ben Fox <[REDACTED]@pfapl.com>; Locke, Liz [REDACTED]@environment-agency.gov.uk>; Stevenson, Kathy [REDACTED]@environment-agency.gov.uk>  
**Subject:** Re: Helios renewable energy project: Tuflow log files

Hi Phil,

My colleague Alex has uploaded again. In the interim, we'll have a look through your comments so far.

Chris

[REDACTED]

**Director**

[REDACTED]

p: [REDACTED]

e: [REDACTED]@aegaea.com

On Tue, 2 Apr 2024 at 18:50, Sale, Philip [REDACTED]@environment-agency.gov.uk> wrote:

Hi Chris,

Unfortunately, the Tuflow log files don't appear to have come through on my system. Did it say that they uploaded successfully at your end? In terms of my review, the log files are not critical at this stage but would be useful to have if possible.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Helios renewable energy project: Tuflow log files  
**Date:** 02 April 2024 18:50:59  
**Attachments:** [Interim Modelling Comments\\_020424.xlsx](#)

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Hi Chris,

Unfortunately, the Tuflow log files don't appear to have come through on my system. Did it say that they uploaded successfully at your end? In terms of my review, the log files are not critical at this stage but would be useful to have if possible.

In terms of the review, I hope to have the full model review completed early next week. Apologies for the slight delay with this. In terms of my review comments so far, there are some things to consider around the fluvial boundary conditions, particularly for the River Aire and River Ouse, the tidal boundary conditions, and testing the H++ tidal scenario within the model. The attached spreadsheet provides the comments I have so far on the hydraulic model. The full review spreadsheet will come next week but I thought it would be useful to share these comments for your consideration in the interim.

Let me know if you need any further information at this stage.

Kind regards,

Phil

[REDACTED]  
**Modelling Specialist – National Infrastructure Team**  
**Environment Agency** | Trentside Office, Scarrington Road, Nottingham, NG2 5BR

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**Incident management standby role:** Monitoring and Forecasting Duty Officer (MFDO) – West and East Midlands

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**From:** Chris Cameron-Hann [REDACTED]@aegaea.com>  
**Sent:** Tuesday, April 2, 2024 11:45 AM  
**To:** Sale, Philip [REDACTED]@environment-agency.gov.uk>; [REDACTED]@pfapl.com>  
**Subject:** Re: Helios renewable energy project: Tuflow log files

Hi Phil,

Hopefully you've received all the log files by now? Do you have any update for us on when we might see sight of the first review?

Chris



## Chris Cameron-Hann

Director

[REDACTED]

p: [REDACTED] | [REDACTED]

e: [REDACTED]@aegaea.com

On Tue, 26 Mar 2024 at 09:53, Sale, Philip [REDACTED]@environment-agency.gov.uk> wrote:

Hi Chris,

Would it be possible to get a copy of the Tuflow log folder if you still have it on file for the simulations you have undertaken?

I am not sure how large this will be zipped up, but I have put an upload link below in case it is too large to email

### Upload link

[REDACTED]

Many thanks,

Phil

[REDACTED]

**Modelling Specialist – National Infrastructure Team**

**Environment Agency** | Trentside Office, Scarrington Road, Nottingham, NG2 5BR

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Helios Renewable Energy Project - EA  
**Date:** 12 March 2024 19:02:06  
**Attachments:** [33627 Helios\\_FA\\_Agenda\\_130324.docx](#)

---

Hi all,

Please see high level agenda for tomorrow's meeting.

Looking forward to seeing you all virtually tomorrow.

Many thanks,

Jordan

[REDACTED]  
Associate - Infrastructure Planning

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Mobile: +44 77146 88092

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## 33627 Helios Renewable Energy Project: EA statutory consultation follow up

**Location:** Team Meeting via Microsoft Teams

**Date:** 13 March 2024

### Attendees

- Bev Lambert (EA)
- Kathy Stevenson (EA)
- Mitchell Scott (EA)
- Liz Locke (EA)
- Lizzie Griffiths (EA)
- Lewis Baines (EA)
- Ben Fox (PFA)
- Simon Mallard (PFA)
- Chris Cameron-Hann (Aegaea)
- Gareth Wilson (Stantec)
- Mary Mescal (Stantec)
- Jordan Green (Stantec)
- Ellie Holderness (Stantec)
- Abi Bartlett (Stantec)

Item	Comments for Discussion
Introductions	N/A
Project Status Update	Statement of Common Ground (SoCG)
EA Statutory Consultation Response	Water environment topic update
	Flood Modelling Update <ul style="list-style-type: none"> <li>- Summary of Flood Model</li> <li>- Timescales for EA flood model review</li> </ul>
	Flood Risk Assessment update
	Groundwater Protection <ul style="list-style-type: none"> <li>- Piling</li> <li>- Construction and Decommissioning</li> </ul>
	Pollution Prevention
	BESS
AOB	N/A
Close	N/A



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note  
**Date:** 22 February 2024 10:29:00  
**Attachments:** [image002.png](#)  
[image008.png](#)

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Good morning Matthew

I would be grateful if you could provide an update on the progress / timescales associated with the flood model review for the Helios Renewable Energy project.

Any update would assist to allow us to capture the current position in the ES chapter / FRA which is being finalised in advance of formal submission of the scheme.

Kind regards

Ben Fox *BSc (Hons) MCIWEM C. WEM CEnv*  
Associate



[Transport Planning / Highways & Infrastructure Design / Flood Risk & Water Management](#)

PFA Consulting Ltd, Stratton Park House, Wanborough Road, Swindon SN3 4HG

[REDACTED] M: [REDACTED]



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Registered address as above.

---

**From:** Ben Fox [REDACTED]@pfapl.com>  
**Sent:** 13 February 2024 12:15  
**To:** 'Wilcock, Matthew' [REDACTED]@environment-agency.gov.uk>  
**Cc:** 'Lambert, Bev' [REDACTED]@environment-agency.gov.uk>; 'Wallace, Neil' [REDACTED]@environment-agency.gov.uk>; 'Green, Jordan' [REDACTED]@stantec.com>  
**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note

Good afternoon Matthew

I understand you and your team have been speaking separately to Jordan at Stantec regarding the Helios Renewable Energy Project.

I would be grateful if you could confirm your timescales for the flood model review? Any update would assist to allow us to capture the current position in the ES chapter / FRA which is being finalised in advance of formal submission of the scheme.

Kind regards

**Ben Fox** *BSc (Hons) MCIWEM C.WEM CEnv*  
**Associate**



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T: [REDACTED] M: [REDACTED]



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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Helios Renewable Energy Project - EA stat consultation response agenda  
**Date:** 08 February 2024 09:48:41  
**Attachments:** [image001.png](#)  
[image002.png](#)  
**Importance:** High

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Hi Jordan

Thanks for sending the agenda through.

Unfortunately, Kathy has been off poorly all this week, and I don't know whether she'll be back on Monday, but if she is, she may need some time to prepare ahead of the meeting. She is our Flood Risk technical expert and is critical to the meeting. We might have to re-arrange.

I'm on leave tomorrow, back in on Monday. I've had a look at both our calendars, and it looks like we may be able to fit a meeting in later in the week or certainly the week after if we can't make Monday. I'll let you know as soon as I can.

Apologies for any inconvenience.

Kind regards

***Bev Lambert***  
***Sustainable Places - Planning Advisor and Assistant Flood Warning Duty Officer***

Please accept my thanks for your email in advance - each UK adult sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year.

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**Team email:** [REDACTED][@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)

Environment Agency, First Floor, Foss House, Kings Pool, Peasholme Green, YORK, YO1 7PX





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**From:** Green, Jordan [REDACTED]@stantec.com>  
**Sent:** Wednesday, February 7, 2024 6:33 PM  
**To:** Lambert, Bev [REDACTED]@environment-agency.gov.uk>; Wilson, Gareth [REDACTED]@stantec.com>; Mescall, Mary [REDACTED]@stantec.com>; Holderness, Ellie [REDACTED]s@stantec.com>; Ben Fox [REDACTED]@pfaplc.com>; 'Chris Cameron-Hann' [REDACTED]@aegaea.com>; mskivington [REDACTED]n@pfaplc.com>; smillard [REDACTED]@pfaplc.com>  
**Cc:** Barrow, Julie <[REDACTED]@stantec.com>; Bartlett, Abigail [REDACTED]@stantec.com>; Stevenson, Kathy [REDACTED]@environment-agency.gov.uk>  
**Subject:** Helios Renewable Energy Project - EA stat consultation response agenda

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Hi all,

Ahead of our meeting on Monday, I have prepared the attached agenda.

Please contact me should there be anything you would like to add.

Thanks,

Jordan

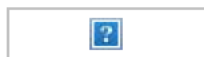
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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note  
**Date:** 13 February 2024 12:14:00  
**Attachments:** [image002.png](#)  
[image008.png](#)

---

Good afternoon Matthew

I understand you and your team have been speaking separately to Jordan at Stantec regarding the Helios Renewable Energy Project.

I would be grateful if you could confirm your timescales for the flood model review? Any update would assist to allow us to capture the current position in the ES chapter / FRA which is being finalised in advance of formal submission of the scheme.

Kind regards

Ben Fox *BSc (Hons) MCIWEM C. WEM CEnv*  
Associate



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T: [REDACTED] M: [REDACTED]



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**From:** Ben Fox [REDACTED]@pfapl.com>  
**Sent:** 16 January 2024 08:47  
**To:** 'Wilcock, Matthew' [REDACTED]@environment-agency.gov.uk>  
**Cc:** 'Lambert, Bev' [REDACTED]@environment-agency.gov.uk>; 'Wallace, Neil' [REDACTED]@environment-agency.gov.uk>  
**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note

Good morning Matthew

Further to my email last week I would be grateful if you confirm that the flood modelling files have been received and your flood model / hydraulic model review process has been instructed?

From my experience there is always a bit of back and forth with the admin associated with getting this process going. Please give me a call if you need anything else from me and I can liaise

with our flood modellers (Aegaea).

Kind regards

Ben Fox *BSc (Hons) MCIWEM C.WEM CEnv*  
Associate



[Transport Planning](#) / [Highways & Infrastructure Design](#) / [Flood Risk & Water Management](#)

PFA Consulting Ltd, Stratton Park House, Wanborough Road, Swindon SN3 4HG

T: [REDACTED] : [REDACTED]



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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note  
**Date:** 10 January 2024 09:18:00  
**Attachments:** [image002.png](#)  
[image008.png](#)

---

Dear Matthew

Our flood modellers (Aegaea) have confirmed that the flood model for the Helios Renewable Energy Project have been uploaded to the fileshare link provided.

Please can you confirm the files have been received and your timescales to undertake the model review? Given the nature of the flood model (series of interlinked files) please do not hesitate to reach out if you need any further information to conduct your review.

These modelling files need to be read in conjunction with the Flood Risk Assessment (Ref: E216-DOC01-FRA-DRAFT 7, dated 06/12/2023) and specifically the Aegaea Hydraulic Model Technical Note (Ref: AEG0851\_YO8\_EnsoEnergy\_03, dated 06/12/2023).

Kind regards

Ben Fox *BSc (Hons) MCIWEM C.WEM CEnv*  
Associate



[Transport Planning](#) / [Highways & Infrastructure Design](#) / [Flood Risk & Water Management](#)

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---

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Company Registered in England 03871018.  
Registered address as above.

---

Jordan Green  
Stantec  
7 Soho Square  
London  
W1D 3QB

**Our ref:** RA/2023/146419/01-L01  
**Your ref:** N/A  
**Date:** 22 December 2023

By email: [REDACTED]@stantec.com

Dear Jordan

**HELIOS RENEWABLE ENERGY PROJECT – FORMAL CONSULTATION UNDER SECTION 42 OF THE PLANNING ACT 2008 (AS AMENDED) – SOUTHWEST OF THE VILLAGE OF CAMBLESFORTH, SELBY**

Thank you for consulting us on this proposal which we received on 24 October 2023. We have the following comments to make and appreciate you accepting these following our email agreement on 12<sup>th</sup> December 2023.

We recognise that additional information has recently been submitted to the online consultation platform. This response does not include reference to or comment upon any related assessments that may form part of the wider proposal.

**FLOOD RISK**

**PEIR – Volume 1 Non-Technical Summary**

From a flood risk perspective, the PEIR non-technical summary fails to reference flooding from all sources and appears focused exclusively on flood risk change resulting from the impacts on drainage and the proposed watercourse crossings. It should reference and address the impact of all sources of flood risk to and from the proposals at this site and provide a more comprehensive summary of the relevant chapter of the main text.

**Flood Risk Assessment**

We support the production of a standalone Flood Risk Assessment (FRA) to inform the Environmental Statement (ES) and note that this is to be supported by site specific modelling. Until this assessment of flood risk is complete, it will be difficult to accept the conclusions of the FRA regarding acceptable design and mitigations offered. We are in ongoing discussion with the applicant with respect to the proposed modelling approach. We welcome ongoing engagement to ensure that the FRA is based on the best available and most appropriate information.

We note that the applicant will not be assessing flood risk without the influence of flood defences and cites the River Ouse CFMP (2010) in support of this approach. The

CFMP is a policy ambition and not a commitment to maintaining or improving local flood defences or standard of protection. Hence, mitigation and adaptation measures proposed as part of this development should be as independent of the effectiveness of flood defences as possible.

The assessment of flood risk at this site should take the following into account.

- Joint probability of tidal and fluvial risk
- Impact of climate change on both peak river flow and sea level rise including an assessment of credible maximum scenario
- Residual risk from breach and overtopping of existing defences.

We support that the assessment of flood risk will cover the construction, operation and decommissioning of the development.

However, the FRA states that this is to be assessed for over a 40-year period to 2070. Guidance (NPPG Para 006) states that for non-residential development a lifespan of 75 years should be used as a starting point for assessment. The FRA should include an assessment of flood risk beyond the 2050 epoch to properly assess future flood risk and to support proposals for mitigation and adaptive measures (s 3.60 – 3.64 ; Table A). This is of importance as the current proposed development lifetime of 2069 is so close to the boundary for the next epoch which starts in 2070.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>)

Sea Level Rise allowances should also include an assessment of flood risk over a 75-year lifespan (s 3.70 Table B). For the assessment of credible maximum scenario, guidance states that the H allowance of 1.9m is to be used. This should not be reduced for assessment to years before 2100.

Mitigation and adaptation measures for Essential Infrastructure in Flood Zone 3a should be developed to ensure that the site can remain safe and operational in times of flood, taking into account predicted impacts of future climate change. ([NPPG Table 2 Flood Risk Vulnerability & flood zone 'incompatibility'](#))

The process for developing these measures should follow the flood risk management hierarchy set out in the NPPG Para 004. Site design should be driven by the requirement to locate the more vulnerable aspects of the development to those areas of least risk. This should include the modelled assessment of residual risk in addition to any additional allowance included to allow for model tolerances. Mitigation approach should prioritise the avoidance of risk and if required, the use of passive over non-passive measures.

Where mitigation measures are defined, these should be referenced to metres above ordnance datum, not to site ground levels, to allow comparison with relevant modelled flood levels.

The FRA proposes the use of suitably designed earth bunds to protect ancillary equipment, the battery energy storage system facility and the 132kv substation. While we appreciate that mitigation design is still in development, we would question why the option to raise the footprint of the relevant elements of infrastructure above flood levels has not been proposed in preference to the bunding of the area.

We support the inclusion of credible maximum scenario in the flood risk assessment as indicated in [NPS EN-1](#) to support a risk averse approach. However, while the credible maximum scenario is described as a sensitivity test in the FRA, the outputs should be

used to establish the climate resilience of the development, and particularly those elements of infrastructure which are critical to the operation of the site. If necessary, the proposals will need to show how the development may be adapted to remain durable and adaptable to future change.

The development of flood risk mitigation and future adaptive approaches is dependent on the site-specific flood modelling providing a robust assessment of the flood risk. We are in ongoing discussion with the applicant with respect to the proposed modelling to ensure that the FRA is based on the best available and most appropriate information.

We support the assertion that level for level compensation will be provided on site to mitigate the impact of the flood bunds, but it must be noted that the assessment for the compensation required should include all relevant aspects of the development.

We understand that the proposals will involve no interaction or potential for impact on remote defences or main river during the construction, operation, or decommissioning phase. However, the CEMP submitted is currently of insufficient detail to allow an assessment of potential impacts particularly during the construction and decommissioning phases.

We welcome early engagement to establish details of works methodology to include, but not to be restricted to, access routes, creation of haul roads and compound areas. Until this is complete, we are unable to say if the works will fall under Environmental Permitting (England & Wales) Regulations 2016 with regard to flood risk activities.

## GROUNDWATER PROTECTION

Wherever legislation allows, we will use a tiered, risk-based approach to regulate activities that may impact groundwater resources and to prevent and limit pollution. Development must be appropriate to the sensitivity of the site. Where the potential consequences of a development or activity are serious or irreversible we will adopt the precautionary principle to manage and protect groundwater. We will also apply this principle in the absence of adequate information with which to conduct an assessment.

We encourage everyone whose activities may impact upon groundwater to consider the [groundwater protection hierarchy](#) in their strategic plans when proposing new development or activities. The aim is to avoid potentially polluting activities being located in the most sensitive locations for groundwater. A sensitive location with respect to groundwater would depend on the hazard from the proposed activity and importance of the receptor. In this case, the developers have acknowledged that parts of the proposed sites are located upon a sensitive Principal Aquifer bedrock (The Sherwood Sandstone) and Secondary A Aquifer drifts (Brighton Sand Formation and Alluvium). Principal aquifers provide significant quantities of drinking water, and water for business needs whilst secondary aquifers potentially provide water supplies at a local level. The developer has also acknowledged that Parcel A and B sit in source protection zone 3 and part of Parcel A sits in source protection zone 1. We designate source protection zones to identify the catchment areas of sources of potable water (that is high quality water supplies usable for human consumption). Within SPZ1 there is a presumption against development that involves activities posing an inherent hazard to groundwater; where appropriate, we will oppose such new developments via the development planning system or refuse a permit application.

We expect developers and operators to assess the area of influence of their activities and to take account of all current and future groundwater uses and dependent

ecosystems. Developers and operators are expected to assess and mitigate the potential impact on groundwater, throughout planning, construction, operation, and decommissioning phases of the development or operation.

We expect developers and operators to provide adequate information to statutory bodies, including the Environment Agency, when submitting their proposals. This is so that the potential impact on groundwater resources and quality can be adequately assessed. In particular, where new techniques, operations, products or substances are involved, developers or operators should be prepared to supply specific relevant data to allow the risk to groundwater to be assessed.

We expect site owners, developers and operators to comply with any relevant:

- government or Environment Agency guidance
- other standards and guidance, e.g. British Standards, International Organisation for Standardisation (ISO)

### **Piling**

In line with Position statement N8 of [The Environment Agency's approach to groundwater protection](#) - Within SPZ1, we will normally object in principle to any planning application for a development that may physically disturb an aquifer.

We have concerns regarding the piling that is being proposed. We note in Chapter 3 section 3.4.9:

*“the framework posts will be pile driven, up to 2.5m below ground level, depending on ground conditions.”*

It has also been mentioned that:

*“Historical boreholes drilled across the Site recorded groundwater at approximately 20m bgl, with exception of one borehole which struck groundwater at 2.3m bgl, Groundwater is expected to be encountered at approximately 20m bgl across the Site.”*

It has been acknowledged in Chapter 9 Section 9.4.16:

*“Based on the available information the underlying ground conditions appear to have variable permeability; however, due to the low-lying nature of the Site and presence of superficial and principal aquifers, high groundwater is likely to be present.”*

The area around Camblesforth is the Brighton Sand Formation which acts as a Secondary A aquifer. BGS logs in the area have shown groundwater to be found at levels of around 2 metres below ground level which runs the risk of being penetrated by piling as described. As such we require a Piling Risk Assessment to be undertaken to assure that no physical disturbance of the Aquifer or SPZ1 will occur due to piling.

**Without this document we may object to the works as part NGW O 02 (see below) and will submit condition NGW C 03 (see below).**

### **Construction and Decommissioning**

We are responsible for the management of groundwater resources in England and for the control of groundwater abstractions. Many activities result in physical disturbance of aquifers and groundwater resources.

In line with Position statement N7 of [The Environment Agency's approach to groundwater protection](#) - Developers proposing schemes that present a hazard to groundwater resources, quality or abstractions must provide an acceptable hydrogeological risk assessment (HRA) to the Environment Agency and the planning



authority. Any activities that can adversely affect groundwater must be considered, including physical disturbance of the aquifer. If the HRA identifies unacceptable risks, then the developer must provide appropriate mitigation. If this is not done or is not possible, we will recommend that the planning permission is conditioned, or we will object to the proposal.

A risk has been raised by the developer in chapter 9 section 9.5.59:

*“The risk of creating new pathways which could pose a risk to groundwater bodies as a result of HDD utility crossing of the railway is uncertain at this stage.”*

We acknowledge that in Chapter 9 section 9.6.5 the developer states:

*“The Hydrogeological Risk Assessment for the HDD utility crossing of the railway will be secured by a suitably worded DCO requirement requiring details to be submitted to and approved by the Local Planning Authority.”*

We will likely object to the works as part of **NGW O 02** (see below) due to the risks these activities could pose to the aquifer. We strongly recommend that as part of this HRA any potential risks to groundwater and mitigation strategies are detailed in any part of the works where there is a risk to the aquifer.

We are broadly satisfied with the current CEMP and DEMP that has been drafted although a more detailed CEMP and DEMP will be required before works take place.

The developer has mentioned in the Chapter 5 section 5.1.5:

*“The Detailed CEMP and Detailed CTMP will be submitted to NYC for approval prior to the commencement of development on-Site, pursuant to requirements that will be included in the DCO.”*

Before works are undertaken, we will require a detailed HRA, CEMP and DEMP to be submitted. Without these documents we may object to the works as part of **NGW O 02** (see below).

### **Pollution Control**

We are broadly satisfied with the mitigation strategies suggested in Chapter 9 in regard to pollution control. We note in Chapter 9 section 9.5.58:

*“The construction activities are unlikely to create new pathways which could pose a risk to groundwater bodies. The risk of groundwater pollution would be as a result of a pollution incident at the surface contaminating the underlying ground and infiltrating/ leaching into the underlying geological deposits which may be a source of groundwater”*

and in 9.5.44:

*“Taking into account the measures outlined above, adopting best practice construction site management with adequate contingency planning, and following the principles of pollution prevention, which will be formalised and incorporated into a Construction Environmental Management Plan (‘CEMP’) secured through a DCO requirement, will reduce the risk of a pollution event occurring. The Outline CEMP(‘oCEMP’) is provided at Appendix 5.1 of the PEIR.”*

Before works are undertaken, we will require a detailed CEMP and DEMP to be submitted. Without these documents we may object to the works as part of **NGW O 02** (see below).

## **Informatives:**

### **NGW I 02 Requirement for an environmental permit**

**Advice to applicant** The piling and excavation work associated with this development will require an environmental permit under the Environmental Permitting (England & Wales) Regulations 2016, from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised. You should be aware that there is no guarantee that a permit will be granted. Additional 'Environmental Permitting Guidance' can be found at: <https://www.gov.uk/environmental-permit-check-if-you-need-one>

### **NGW I 05 The Environment Agency's approach to groundwater protection (pre-application)**

**Advice to applicant** We would like to refer the applicant/enquirer to our groundwater position statements in [The Environment Agency's approach to groundwater protection](#), available from gov.uk. This publication sets out our position for a wide range of activities and developments.

## **Conditions**

### **NGW C 03 Piling – lack of information – details to be agreed**

#### **Environment Agency position**

Piling using penetrative methods can result in risks to potable supplies from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways.

Groundwater is particularly sensitive in this location because the proposed development site:

- is within source protection zone 1 and 3
- is located upon a principal aquifer and secondary aquifer A

In light of the above, the proposed development will only be acceptable if a planning condition controlling disturbance of the aquifer is imposed. Without this condition we would object to the proposal in line with paragraph 174 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

#### **Condition**

Piling using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

#### **Reason(s)**

To ensure that the proposed piling does not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework and **Position Statement N8** of the 'The Environment Agency's approach to groundwater protection'

### **We would only put the following objection in if the documents as mentioned are not supplied:**

## **Objections**

### **NGW O 02 Insufficient information to determine risks to groundwater – general**

#### **Environment Agency position**

We object to the planning application, as submitted, because the risks to groundwater from the development are unacceptable. The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused on this basis in line with paragraph 174 of the National Planning Policy Framework.

## **Reason(s)**

These should be provided based on the following prompts:

Our approach to groundwater protection is set out in 'The Environment Agency's approach to groundwater protection'. In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater especially where the risks of pollution are high and the groundwater asset is of high value. In this case **position statement N7** and **N8** apply.

Groundwater is particularly sensitive in this location because the proposed development site:

- is within source protection zone 1 and 3
- is located upon a principal aquifer and secondary aquifer A

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed. In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality because part of the site lies over a SPZ1 and primary aquifer.

## **Overcoming our objection**

In accordance with our approach to groundwater protection we will maintain our objection until we receive a satisfactory risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed.

Our objection would be overcome if the following is provided:

- A Hydrological Risk Assessment which details groundwater risk
- A detailed CEMP and DEMP which details pollution mitigation strategies
- A detailed Piling Risk Assessment demonstrating the piling will not affect groundwater

## **POLLUTION PREVENTION**

Materials and chemicals likely to cause pollution should be stored in appropriate containers and adhere to guidance for the storage of drums and intermediate bulk containers.

Any facilities, above ground, for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. All filling points, vents, gauges, and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund.

Appropriate procedures, training and equipment should be provided for the site to adequately control and respond to any emergencies including the cleanup of spillages, to prevent environmental pollution from the site operations.

We advise that polluting materials and chemicals are stored in an area with sealed drainage.

## **BATTERY ENERGY STORAGE SYSTEMS**

Battery Energy Storage Systems (BESS) have the potential to pollute the environment. Applicants should consider the impact to all environmental receptors during each phase of development. Particular attention should be applied in advance to the impacts on groundwater and surface water from the escape of firewater/foam and any

contaminants that it may contain. Suitable environmental protection measures should be provided including systems for containing and managing water run-off. The applicant should ensure that there are multiple 'layers of protection' to prevent the source-pathway-receptor pollution route occurring. Appropriate procedures should be provided that clearly illustrate how firewater will be managed, including sufficient details for safe and permitted off-site disposal. Further Government guidance on considering potential risks of BESS in planning applications is available online: [Renewable and low carbon energy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/renewable-and-low-carbon-energy)

Should you require any further information or clarification, please contact me or my colleagues, Bev Lambert/ Matthew Wilcock.

Yours sincerely,

**Neil Wallace**  
**Sustainable Places - Planning Specialist**

Direct e-mail  [@environment-agency.gov.uk](mailto:neil.wallace@environment-agency.gov.uk)  
Team e-mail  [@environment-agency.gov.uk](mailto:neil.wallace@environment-agency.gov.uk)

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note  
**Date:** 21 December 2023 15:52:56  
**Attachments:** [image008.png](#)  
[image010.png](#)

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Dear Ben

Please accept my apologies for the delay in responding to you in relation to the email below. Bev has been very busy with incident response work following recent flooding incidents. I can confirm we have received the files sent through OneDrive. I understand there is an existing charging agreement in place (ref: ENVPAC/1/YOR/00412), I will confirm in due course if we need to extend the agreed time on it to accommodate the review of the FRA or the model review.

You can submit the model files using the following Sharefile link:

[REDACTED]

Please let me know if you have any issues.

Kind regards

**Matthew Wilcock**

Planning Specialist - Sustainable Places (Yorkshire)  
**Environment Agency** | Foss House, Kings Pool, Peasholme Green,  
York, YO1 7PX

Email : [REDACTED]@environment-agency.gov.uk  
Team email : [REDACTED]@environment-agency.gov.uk  
External: [020 3025 5573](tel:02030255573)  
Mobile: [REDACTED]

Working days: [REDACTED]

Pronouns: [REDACTED]



---

**From:** Ben Fox <bfox@pfapl.com>

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [info@helios-renewable-energy-project.co.uk](mailto:info@helios-renewable-energy-project.co.uk); [REDACTED]  
**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note  
**Date:** 12 December 2023 11:33:06

---

Hi Neil

Thanks for forwarding – Jordan is working, just slightly different hours. I have replied below in red:

- a. To review the updated FRA inc the Hydraulic Tech Note  
*Could you kindly confirm if the updated FRA is different to the public consultation documents? The pack submitted on 7<sup>th</sup> December is supplementary and new information and should be read in conjunction with the information submitted for the start of the consultation. Would it help if we loaded everything onto the SharePoint so you have it one place?*
- b. To create a formal review of the flood model produced by Aegaea  
*This process can be started shortly*
- c. Establish if the Env Agency formal consultation reply (despite being late ) will be accepted as valid

*The comments will not take into account but can reference the formal submission of the updated FRA and pending request for a model review ( there is an overlap here/ seem to operate in parallel) – by which date would these need to be returned? Yes. We would want to be in a position of agreement before we finalise the DCO which is scheduled for the end of January. Can you advise me of your timescales so we can factor this in?*

---

**From:** Wallace, Neil [REDACTED]@environment-agency.gov.uk>  
**Sent:** Tuesday, December 12, 2023 10:00 AM  
**To:** Wilson, Gareth [REDACTED]@stantec.com>  
**Subject:** Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note  
**Importance:** High

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Hello Gareth,

Forwarding on in case Jordan isn't around for a while...

Thanks.

**Neil Wallace**

**Planning Specialist** - Sustainable Places (Yorkshire)  
**Email:** [REDACTED]@environment-agency.gov.uk  
**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

---

**From:** Wallace, Neil  
**Sent:** Monday, December 11, 2023 5:25 PM

**To:** Green, Jordan [REDACTED]@stantec.com>

**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note

**Importance:** High

Hello Jordan,

I am a colleague of Bev Elliot's and I've been invited to urgently respond to the requests and have some questions in italics below

– Bev is currently seconded away on flood incident duties:

- a. To review the updated FRA inc the Hydraulic Tech Note  
*Could you kindly confirm if the updated FRA is different to the public consultation documents?*
- b. To create a formal review of the flood model produced by Aegaea  
*This process can be started shortly*
- c. Establish if the Env Agency formal consultation reply (despite being late ) will be accepted as valid  
*The comments will not take into account but can reference the formal submission of the updated FRA and pending request for a model review ( there is an overlap here/ seem to operate in parallel) – by which date would these need to be returned?*

Thanks.

**Neil Wallace**

**Planning Specialist** - Sustainable Places (Yorkshire)

**Email:** [REDACTED]@environment-agency.gov.uk

**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

---

**Sent:** Thursday, December 7, 2023 12:21 PM

**To:** Lambert, Bev [REDACTED]@environment-agency.gov.uk>

**Cc:** 'Green, Jordan [REDACTED]@stantec.com>; 'Chris Cameron-Hann' [REDACTED]@aegaea.com>; 'Kirsty Lodge' [REDACTED]@ensoenergy.co.uk>; Steve Millard [REDACTED]@pfapl.com>; 'Wilson, Gareth' [REDACTED]@stantec.com>

**Subject:** RE: Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model Technical Note

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Good morning Bev

Following on from Gareth's email, to make it clear the Flood Risk Assessment (FRA) is supported by a flood model produced by Aegaea. The flood model will need to be reviewed and ultimately approved.

Please can you provide a fileshare link to enable Aegaea to share the flood model with you and enable you to kick off your hydraulic model review process?

Happy to discuss if anything is unclear

Kind regards

Ben Fox *BSc (Hons) MCIWEM C.WEM CEnv*  
Associate



[Transport Planning](#) / [Highways & Infrastructure Design](#) / [Flood Risk & Water Management](#)

PFA Consulting Ltd, Stratton Park House, Wanborough Road, Swindon SN3 4HG

T: [REDACTED] M: [REDACTED]



PFA Consulting Ltd  
Company Registered in England 03871018.  
Registered address as above.

---

**From:** Wilson, Gareth [REDACTED]@stantec.com>

**Sent:** 07 December 2023 10:48

**To:** Lambert, Bev <[REDACTED]@environment-agency.gov.uk>

**Cc:** Green, Jordan <[REDACTED]@stantec.com>; Ben Fox <[REDACTED]@pfapl.com>; 'Chris Cameron-Hann' [REDACTED]@aegaea.com>; Kirsty Lodge [REDACTED]@ensoenergy.co.uk>

**Subject:** Helios Renewable Energy Project - Updated Flood Risk Assessment and Hydraulic Model



Technical Note

Hi Bev

Further to our online meeting in November, I have provided the link below to the updated Flood Risk Assessment incorporating the Hydraulic Model Technical Note (Appendix 10) for the Environment Agency's review and comment.

The files are available here: [REDACTED]

Please can you confirm you are able to access the files?

This follows previous reports issued as follows:

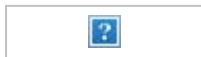
- Scoping report and preliminary 'terms of reference' - 27 January 2023
- Update to the scoping report following comments - 11th August 2023

If you require copies of previous studies or any other information, please contact me.

If you are able to provide me with an approx. timescale for responding that would be much appreciated .

Kind regards  
Gareth

**Gareth Wilson**  
Planning Director  
Mobile: [REDACTED]



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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101  
**Date:** 06 June 2023 11:53:02  
**Attachments:** [image002.png](#)  
[image004.png](#)  
[Conditional Licence 5 6 7.docx](#)

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Hi Ben,

We have looked into this and believe that there is some confusion over the data. Our understanding is that you require the **2020 Humber 2100+ Strategy Extreme Water Level** data and relevant model files and report, not the **2020 HEWL**. Both models were concluded in 2020 and given their similar names it has caused confusion before.

Therefore please find attached the conditional licence for the Humber 2100+ Strategy Extreme Water Levels, within which you'll find Sharefile links to the data required.

Please note that the Sharefile links have a 30-day retention period before expiring. I anticipate this would be calculated from Friday 2 June 2023 when I received the link. I trust that this resolves your query. If you do need any further explanation please let me know and I shall get someone to contact you.

Kind regards

Frances

**Frances Edwards MSc PIEMA**

Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)

**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[REDACTED] [@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)

My team inboxes are :

Yorkshire Sustainable Places [REDACTED] [@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)

LN Planning [REDACTED] [@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)

[REDACTED]

Mobile : [REDACTED]

Phone : [REDACTED]

Pronouns: [REDACTED]

---

## Rebecca Smith

---

**From:** Edwards, Frances <[REDACTED]s@environment-agency.gov.uk>  
**Sent:** 18 May 2023 11:28  
**To:** Ben Fox  
**Cc:** [REDACTED]  
**Subject:** RE: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

Hi Ben,  
I shall look into this and get back to you as soon as possible.  
Kind regards  
France

**Frances Edwards MSc PIEMA**  
Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)  
**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[REDACTED]@environment-agency.gov.uk

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[REDACTED] e

Mobile : [REDACTED]

Phone : [REDACTED]

Pronouns: [REDACTED]

---

**From:** Ben Fox [REDACTED]@pfaplc.com>  
**Sent:** 18 May 2023 11:24  
**To:** Edwards, Frances <[REDACTED]@environment-agency.gov.uk>  
**Cc:** 'Mark Skivington' [REDACTED]@pfaplc.com>; 'Steve Millard' [REDACTED]@pfaplc.com>; 'Chris Cameron-Hann' [REDACTED]@aegaea.com>  
**Subject:** RE: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

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Good morning Frances

Thank you for providing the 'Method Statement Review' in relation to the Helios Renewable Energy Project.

The document references the Humber 2100+ Extreme Water Levels (HEWL) project prepared by Jacobs on behalf of the EA in 2020.

PFA requested all relevant flood risk information and relevant flood models in July 2022. The EA provided a response on 10<sup>th</sup> August 2022 (Ref: RFI/2022/272419) which did not reference the HEWL.

As such please can you share the associated model report, files and outputs for the HEWL with both PFA and Aegaea to assess?

Please let me know if you require any further information to progress this request for information.

Kind regards

Ben Fox BSc (Hons) MCIWEM C.WEM CEnv  
Associate



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Swindon SN3 4HG

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**From:** Mark Skivington [redacted]@pfapl.com>  
**Sent:** 16 May 2023 09:43  
**To:** Ben Fox [redacted]@pfapl.com>; 'Steve Millard' <[redacted]@pfapl.com>  
**Subject:** FW: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

---

**From:** Edwards, Frances <[redacted]@environment-agency.gov.uk>  
**Sent:** 16 May 2023 09:42  
**To:** Chris Cameron-Hann [redacted]@aegaea.com>  
**Cc:** Mark Skivington <[redacted]@pfapl.com>  
**Subject:** RE: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

Hi Chris,  
I have finally received the methodology review for Helios. I apologise for the lengthy delays with the review process. I wanted to get this to you as soon as I received it so I have not asked one of our flood risk team to read it through first. If you have any queries about it please let me know.  
Kind regards  
Frances

**Frances Edwards MSc PIEMA**  
Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)  
**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[redacted]@environment-agency.gov.uk

My team inboxes are :

Yorkshire Sustainable Places [redacted]@environment-agency.gov.uk

LN Planning [redacted]@environment-agency.gov.uk

If emailing my team inbox please ensure to add 'For Frances' in subject title

Mobile : [REDACTED]

Phone : [REDACTED]

Pronouns: [REDACTED]

---

**From:** Edwards, Frances

**Sent:** 09 May 2023 12:06

**To:** Chris Cameron-Hann [REDACTED] <[\[REDACTED\]@aegaea.com](mailto:[REDACTED]@aegaea.com)>

**Cc:** Mark Skivington [REDACTED] <[\[REDACTED\]@pfaplc.com](mailto:[REDACTED]@pfaplc.com)>

**Subject:** RE: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

Hi Chris,

I am just working my way through a long list of emails after being on leave for nearly two weeks. I had made arrangements for the review to be sent straight to you in my absence. I did receive an email on 4<sup>th</sup> May from the Evidence and Risk team with an apology that the consultant who had been asked to complete the review had been "having issues with their network over the last few days. Their reviewer is expecting to complete the review by COP tomorrow.". Unfortunately you were not copied into this email to keep you informed. A quick scan of the rest of my emails indicates that I have not been sent anything since then. I shall follow this up with the team this afternoon and get back to you as soon as I can.

Kind regards

Frances

**Frances Edwards MSc PIEMA**

Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)

**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[REDACTED] <[\[REDACTED\]@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)>

My team inboxes are :

Yorkshire Sustainable Places [REDACTED] <[\[REDACTED\]@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)>

LN Planning [REDACTED] <[\[REDACTED\]@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)>

Mobile : [REDACTED]

Pronouns [REDACTED]

---

**From:** Chris Cameron-Hann [REDACTED] <[\[REDACTED\]@aegaea.com](mailto:[REDACTED]@aegaea.com)>

**Sent:** 03 May 2023 15:23

**To:** Edwards, Frances [REDACTED] <[\[REDACTED\]@environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)>

**Cc:** Mark Skivington [REDACTED] <[\[REDACTED\]@pfaplc.com](mailto:[REDACTED]@pfaplc.com)>

**Subject:** Re: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

Hi Frances,

We were expecting some feedback early this week on our proposed plan for Helios.

Do you have any update for us?

Chris  
**Chris Cameron-Hann**  
Director

p: [REDACTED]  
[REDACTED]@aegaea.com

**Aegaea**  
Flood Risk, Water and Environmental Consulting

On 18 Apr 2023, at 09:23, Edwards, Frances <[REDACTED]s@environment-agency.gov.uk> wrote:

Hi Chris,  
I am in meetings all morning. I shall check up and get back to you this afternoon.  
Kind regards  
Frances

**Frances Edwards MSc PIEMA**  
Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)  
**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[REDACTED]@environment-agency.gov.uk

My team inboxes are :

Yorkshire Sustainable Places [REDACTED]environment-agency.gov.uk

LN Planning [REDACTED]@environment-agency.gov.uk

[REDACTED]

Mobile : [REDACTED]

Phone : [REDACTED]

Pronouns: [REDACTED]

---

**From:** Chris Cameron-Hann [REDACTED]@aegaea.com>  
**Sent:** 18 April 2023 07:58  
**To:** Edwards, Frances [REDACTED]@environment-agency.gov.uk>  
**Cc:** Mark Skivington <[REDACTED]@pfaplc.com>  
**Subject:** Re: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

Hi Frances,

Do we have anything further to report on progress here?

I note I'm also still awaiting correspondence on a hard drive for the additional data required!

Chris  
**Chris Cameron-Hann**  
Director

p: [REDACTED]  
e: [REDACTED]@aegaea.com

**Aegaea**  
**Flood Risk, Water and Environmental Consulting**

On 29 Mar 2023, at 13:28, Chris Cameron-Hann [REDACTED]@aegaea.com> wrote:

Hi Frances,

Thank you for your email. I look forward to hearing about the updates this week. The team are particularly keen to keep moving on this, so your assistance is appreciated.

Chris  
**Chris Cameron-Hann**  
Director

p: + [REDACTED]  
e: [REDACTED]@aegaea.com

**Aegaea**  
**Flood Risk, Water and Environmental Consulting**

On 28 Mar 2023, at 16:45, Edwards, Frances  
<[REDACTED]@environment-agency.gov.uk> wrote:

Hi Chris,  
Firstly please accept my apologies for all the delays you are experiencing I appreciate how frustrating this must be.  
I shall contact the C&E team directly about your request RFI/2022/272419 to try and find out what has happened there.  
With regards to our advice for the Flood Modelling Scoping Strategy, there has been a delay within our Data and Evidence team. I hope to be able to give you a revised completion date for this later this week.

Kind regards  
Frances

**Frances Edwards MSc PIEMA**  
Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)  
**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[REDACTED]@environment-agency.gov.uk

My team inboxes are :

Yorkshire Sustainable Places [REDACTED]@environment-agency.gov.uk

LN Planning [REDACTED]@environment-agency.gov.uk

[REDACTED]

Mobile : [REDACTED]

Phone : [REDACTED]

Pronouns: [REDACTED]

---

From: Chris Cameron-Hann [REDACTED]@aegaea.com>

Sent: 23 March 2023 10:18

To: Edwards, Frances [REDACTED]@environment-agency.gov.uk>

Cc: Mark Skivington [REDACTED]@pfaplc.com>

Subject: Re: Cost Recovered Advice: Helios : ENVPAC/1/YOR/00412 RA/2023/145101

Thanks Frances.

I also requested whether I can send a Hard Drive to get access to the models previously sent via share file as they are too large to adequately download all the info.

I haven't received a response on this yet either and I'd be grateful for your assistance to get this sorted.

Chris

**Chris Cameron-Hann**  
Director

p: [REDACTED]  
e: [REDACTED]@aegaea.com  
<image001.png>

**Flood Risk, Water and Environmental Consulting**

On 10 Mar 2023, at 11:11, Edwards, Frances  
<[REDACTED]@environment-agency.gov.uk>  
wrote:

Hi Chris,  
I have completed the request to our Data and Evidence team for this work. The expected turnaround of 2 weeks. I am waiting for confirmation of a completion estimate but would anticipate receiving the information by the end



of March. When I have a more accurate deadline I will let you know.

Kind regards

Frances

**Frances Edwards MSc PIEMA**

Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)

**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[Redacted] [@environment-agency.gov.uk](mailto:[Redacted]@environment-agency.gov.uk)

My team inboxes are :

Yorkshire Sustainable Places [Redacted]

[Redacted] [@environment-agency.gov.uk](mailto:[Redacted]@environment-agency.gov.uk)

LN Planning [Redacted] [@environment-agency.gov.uk](mailto:[Redacted]@environment-agency.gov.uk)

[Redacted]

Mobile : [Redacted]

Pronouns: [Redacted]

---

**From:** Edwards, Frances

**Sent:** 09 March 2023 14:09

**To:** Chris Cameron-Hann [Redacted] [@aegaea.com](mailto:[Redacted]@aegaea.com)>

**Cc:** Mark Skivington [Redacted] [@pfaplc.com](mailto:[Redacted]@pfaplc.com)>

**Subject:** RE: Cost Recovered Advice: Helios : ENVFAC/1/YOR/00412 RA/2023/145101

Hi Chris,

I do apologise that I have not got back to you. I have some urgent work plus personal life meaning I haven't been working as much as planned. If I can get a proper response to you by tomorrow I will and if not please be assured I will pass it to a colleague.

Kind regards

Frances

**Frances Edwards MSc PIEMA**

Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)

**Environment Agency** | Lateral, 8 City Walk, Leeds, LS11 9AT

[Redacted] [@environment-agency.gov.uk](mailto:[Redacted]@environment-agency.gov.uk)

My team inboxes are :

Yorkshire Sustainable Places [REDACTED]  
[REDACTED]@environment-agency.gov.uk

LN Planning [REDACTED]@environment-  
agency.gov.uk

[REDACTED]

Mobile : [REDACTED]

Pronouns [REDACTED]

---

**From:** Chris Cameron-Hann [REDACTED]@aegaea.com>  
**Sent:** 09 March 2023 13:26  
**To:** Edwards, Frances  
[REDACTED]s@environment-agency.gov.uk>  
**Cc:** Mark Skivington <[REDACTED]@pfapl.com>  
**Subject:** Re: Cost Recovered Advice: Helios :  
ENVPAC/1/YOR/00412 RA/2023/145101

Hi Frances,

Just wondering what the next steps are here?

I have sent back the form, but have not heard from you since then?

How can we now progress this?

Chris  
**Chris Cameron-Hann**  
Director

p: [REDACTED]  
[REDACTED]@aegaea.com  
<image001.png>

**Flood Risk, Water and Environmental Consulting**

On 13 Feb 2023, at 16:33, Edwards,  
Frances  
[REDACTED]@environment-  
agency.gov.uk> wrote:

Dear Chris

I am pleased to confirm that we can provide you with planning advice on the Flood Model Scoping Strategy as requested. I have attached our offer letter. We expect the cost of our advice to be £1500 (15 hours) plus VAT

charged at 20%. The 14 hour review time is made up of 10 hours from the modelling team and up to 4 hours for the flood risk advisor to consider the scope against local knowledge and planning guidance. Please note that we only charge for time taken and so the total charge for our advice may be less. The modelling team currently have an estimate of two weeks to complete their review. I would therefore anticipate being able to provide you with our advice 3 to 4 weeks from the date we receive your agreement.

I have attached a breakdown of our quote estimate and a pro-forma. Our standard terms can be viewed at <https://www.gov.uk/government/publications/planning-and-marine-licence-advice-standard-terms-for-our-charges/planning-and-marine-licence-advice-standard-terms-for-our-charges>. Please complete and return the pro-forma by email reply along with confirmation you accept the agreement for us to proceed. We will start work on your project within 3 days of receipt of your acceptance of this offer and aim to provide a response in 21 days.

We welcome your feedback on our service. Please tell us what you think by completing our survey <https://www.smartsurvey.co.uk/s/PlanningAdviceServiceCustomerSurvey/>



We look forward to working with you to provide advice on your proposal. If you have any queries, please contact me on

Kind regards,

**Frances Edwards MSc PIEMA**  
Planning Specialist (Humber),  
Sustainable Places (Yorkshire /  
Lincolnshire &  
Northamptonshire)  
**Environment Agency** | Lateral,  
8 City Walk, Leeds, LS11 9AT

 [@environment-agency.gov.uk](mailto: @environment-agency.gov.uk)

My team inboxes are :

Yorkshire Sustainable Places   
 [@environment-agency.gov.uk](mailto: @environment-agency.gov.uk)

LN  
Planning [REDACTED]@environm  
[ent-agency.gov.uk](http://ent-agency.gov.uk)

[REDACTED]  
[REDACTED]  
[REDACTED]

Mobile : [REDACTED]

Pronouns: [REDACTED]

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**From:** [REDACTED]  
**To:** [REDACTED]@pfaplc.com  
**Subject:** Your Enquiry: RFI/2023/311720  
**Date:** 20 June 2023 13:17:53  
**Attachments:** [GWCL standard enquiry response FAQ April 23.pdf](#)  
[RFI2023311720 Water Abstraction Licence Details.xlsx](#)

---

**Our Ref:** RFI/2023/311720

Dear Ben

**RE: E216: Helios Renewable Energy Project - Groundwater Source Protection  
Request for information under the Freedom of Information Act 2000 (FOIA) / Environmental  
Information Regulations 2004 (EIR)**

Thank you for your enquiry which was received on 15 May 2023

This site is located in the SANDSTONE (SHERWOOD SANDSTONE GROUP), a Principal aquifer and there is a designated Source Protection Zones at this location:

FAIR OAKS, BURN, SELBY

Status/Type: Open - GROUNDWATER - BOREHOLE

Sample point ref: 400D0393

If more information is needed, the British Geological Survey hold borehole records which may have useful information. These records can be viewed via their mapping and data site [REDACTED]

Please refer to the to the attached leaflet named GWCL standard enquiry response FAQ April 23, that will give you access to information available publicly

This information is provided subject to the Open Government Licence ([here](#)). Please read for details of permitted use.

-  
**Water Abstractions (AfA135)**

Please find attached details of the water abstraction licences which are protected by the Groundwater Source Protection Zones (GSPZ) relevant to the site of interest.

The GSPZ situated at SE 61439 27969 is a default zone 1 set to protect licence 2/27/24/300/R01.

The site boundary also crosses into a zone 3 GSPZ set to protect public water supply licences: 2/27/18/080, 2/27/18/079, 2/27/18/077, 2/27/18/078, 2/27/18/081 and 2/27/18/120/R01 so I have included details of these licences too.

This information is not available with the Open Government Licence but we may be able to license to you under the [Environment Agency Conditional Licence](#).

- **Water Abstractions (AfA135)** – detailed information about this dataset including

conditions can be found on the within the [Register Licence Abstract](#) (you will need to download this spreadsheet to access the information about AfA135).

However, you must first check the supporting information available online to determine if the conditions on use are suitable for your purposes.

If they aren't, this information is not provided with a licence for use, and the data is provided for read right only.

We respond to requests for recorded information that we hold under the Freedom of Information Act 2000 (FOIA) and the associated Environmental Information Regulations 2004 (EIR).

If you are not satisfied with our response to your request for information you can contact us within 2 calendar months to ask for our decision to be reviewed.

If you require any further help, please do not hesitate to contact me.

Yours sincerely

**Melanie Brown-Bennett**

Enquiries Officer | Customer & Engagement Team | Yorkshire Area

Tel: [REDACTED]

[REDACTED] [-bennett@environment-agency.gov.uk](mailto:[REDACTED]-bennett@environment-agency.gov.uk)

**Environment Agency**

Enquiries Team Tel: [REDACTED]

[REDACTED] [\[REDACTED\].gov.uk](http://[REDACTED].gov.uk)

Working Days: Monday to Friday

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## Rebecca Smith

---

**From:** Enquiries, Unit [REDACTED]@environment-agency.gov.uk>  
**Sent:** 15 May 2023 09:07  
**To:** [REDACTED]  
**Subject:** Auto Reply Acknowledgement

Please note this is an auto reply message.

Thank you – the Environment Agency has received your email.

Freedom of Information Act and Environmental Information Regulations state that a public authority must respond to requests for information within 20 working days.

For information on what you can expect from us and our full service commitment to you then please visit our website:

<https://www.gov.uk/government/publications/environment-agency-customer-service-commitment>

If you have made a data request, you may wish to look at [www.data.gov.uk](http://www.data.gov.uk) to see if the data you have requested is available online.

Usually we make no charge for providing information. In some cases we may make a charge for licensed re-use of our data. Where this is the case, we will notify you in advance.

If you have provided any personal information (also called personal data) in your enquiry, the Environment Agency will follow all applicable UK and EU data protection laws in how we treat it. We may use your information to help you with your enquiry, if necessary. More details on your rights and how we will process your personal information can be found in our Personal Information Charter:

<https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter>

### **Environmental Incident**

If your email was to report an environmental incident i.e. pollution, fish in distress, dumping of hazardous waste etc. then please call our **Freephone 24 hour Incident Hotline** on **0800 80 70 60**.

For more details about incident reporting please see our website:

<https://www.gov.uk/report-an-environmental-incident>

Did you find this auto response useful?

Yes

No

Kind Regards,

National Customer Contact Centre - Part of National Operations Services

☎ Tel: 03708 506 506

🌐 Web Site: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Click an icon to keep in touch with us:-





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## Rebecca Smith

---

**From:** Ben Fox [REDACTED]@pfapl.com>  
**Sent:** 15 May 2023 09:06  
**To:** Environment Agency (enquiries) (enquiries@environment-agency.gov.uk)  
**Subject:** E216: Helios Renewable Energy Project - Groundwater Source Protection  
**Attachments:** E216-Groundwater Source Protection Zone.pdf; E216-Site Boundary-090523.zip

Good morning

PFA Consulting are progressing a flood risk assessment and drainage strategy for a solar farm development in the vicinity of Drax Power Station known as Helios Renewable Energy Project.

As part of our environmental assessment we have identified that a Zone 1 of a groundwater source protection zone lies within the site.

Do you have any information associated with this GSPZ? I tried to view the public 'Water Abstraction and Impounding Register' online but it does not appear to be available as a searchable online register just yet.

The GSPZ of interest is located at X:461439 , Y:427969 (SE 61439 27969) and the nearest postcode is YO8 8LE. A site location plan is attached.

Any information on this GSPZ would be of use for our assessment and to ensure we can avoid any significant effects of the proposed development.

Kind regards

**Ben Fox** BSc (Hons) MCIWEM C.WEM CEnv  
Associate



**PFA Consulting Ltd**  
Stratton Park House  
Wanborough Road  
Swindon SN3 4HG

E: [REDACTED]@pfapl.com / T: [REDACTED] / M: [REDACTED]

[www.pfapl.com](http://www.pfapl.com) / Find us on **LinkedIn**

---

PFA Consulting Ltd  
Company Registered in England 03871018.  
Registered address as above.

## Rebecca Smith

---

**From:** Chris Cameron-Hann <[REDACTED]@aegaea.com>  
**Sent:** 31 January 2023 09:28  
**To:** [REDACTED]@bartonwillmore.co.uk; [REDACTED]@ensoenergy.co.uk; [REDACTED]  
**Subject:** Fwd: Helios Renewable Energy Project | RFI/2022/272419  
**Attachments:** AEG0851\_HeliosRenewableEnergyProject\_004.pdf

Hi All,

My apologies for forgetting to cc you in the email to the EA.

Chris

### Chris Cameron-Hann

#### Director

[Book a Meeting](#)

p: [REDACTED]

e: [REDACTED]@aegaea.com



### Flood Risk, Water and Environmental Consulting

----- Forwarded message -----

**From:** Chris Cameron-Hann [REDACTED]@aegaea.com>  
**Subject:** Helios Renewable Energy Project | RFI/2022/272419  
**To:** Edwards, Frances [REDACTED]@environment-agency.gov.uk>, [REDACTED]@environment-agency.gov.uk>, [REDACTED]@environment-agency.gov.uk>

Dear Frances,

Further to your requests for us to prepare a flood model scoping strategy and consultation, I attach our draft report for your consideration with regards to Helios.

Please let me know if you have any questions and when would be a good time to think about arranging the initial meetings that I suggest.

Chris

**Chris Cameron-Hann**

**Director**

[Book a Meeting](#)

p: [REDACTED]

e: [REDACTED][@aeqaea.com](mailto:[REDACTED]@aeqaea.com)



**Flood Risk, Water and Environmental Consulting**



**Chris Cameron-Hann**

**Director**

[REDACTED]

p: [REDACTED]

e: [REDACTED]@aegaea.com



**Flood Risk, Water and Environmental Consulting**

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## Rebecca Smith

---

**From:** Edwards, Frances [REDACTED]s@environment-agency.gov.uk>  
**Sent:** 28 October 2022 13:42  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Your Enquiry: RFI/2022/272419 (E216)

Dear Mark,

I am currently the team lead for the Helios project. I have discussed your request with our flood risk team with a view to arranging a meeting. They consider that a meeting would require input from our flood modellers. Unfortunately our modellers are not able to attend meetings because of resource issues. I would therefore like to discuss with you the information we would require you to email to me so that I can arrange for charged written advice. I have just tried to call but you are unavailable. Do you have a direct line I could contact you on Monday?

Kind regards  
Frances

### Frances Edwards MSc PIEMA

Planning Specialist (Humber), Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)  
Environment Agency | Lateral, 8 City Walk, Leeds, LS11 9AT

[REDACTED]@environment-agency.gov.uk

My team inboxes are :

Yorkshire Sustainable Places [REDACTED]@environment-agency.gov.uk

LN Planning [REDACTED]@environment-agency.gov.uk

Mobile [REDACTED]

Pronouns [REDACTED]

---

**From:** Mark Skivington [REDACTED]@pfaplc.com>  
**Sent:** 26 October 2022 09:39  
**To:** Sustainable Places, Yorkshire [REDACTED]@environment-agency.gov.uk>  
**Cc:** 'Steve Millard' [REDACTED]@pfaplc.com>; Ben Fox [REDACTED]@pfaplc.com>  
**Subject:** RE: Your Enquiry: RFI/2022/272419 (E216)

You don't often get email from [REDACTED]@pfaplc.com. [Learn why this is important](#)

**Warning: The sender of this message could not be validated. Please use caution when opening any message content such as attachments or links**

Good morning Mike,

The Planning Inspectorate Reference is EN010140. Please let me know if you need any further information.

Kind regards,

Mark Skivington BSc (Hons) MSc  
Associate



PFA Consulting Ltd  
Stratton Park House  
Wanborough Road  
Swindon SN3 4HG

E: [redacted]@pfapl.com / T: [redacted]

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---

PFA Consulting Ltd  
Company Registered in England 03871018.  
Registered address as above.

---

**From:** Sustainable Places, Yorkshire [redacted]@environment-agency.gov.uk>  
**Sent:** 20 October 2022 09:22  
**To:** [redacted]@pfapl.com  
**Subject:** FW: Your Enquiry: RFI/2022/272419 (E216)

Hi Mark,

Could you please provide the NSIP reference number or a site location document. I can then log your enquiry.

Kind regards,

Mike.

*Mike Walsh*  
*Sustainable Places - Planning Assistant*

**TEAM CONTACT DETAILS:**

Email: [redacted]@environment-agency.gov.uk

Tel: [redacted]

Environment Agency, First Floor, Foss House, Kings Pool, Peasholme Green, YORK, YO1 7PX

---

**From:** Mark Skivington <[redacted]@pfapl.com>  
**Sent:** 19 October 2022 14:57  
**To:** Edwards, Emma [redacted]@environment-agency.gov.uk>  
**Cc:** Susie Concannon; 'Steve Millard' [redacted]@pfapl.com>; 'Chris Cameron-Hann' [redacted]@aegaea.com>; Ben Fox <[redacted]@pfapl.com>  
**Subject:** RE: Your Enquiry: RFI/2022/272419 (E216)

**Warning: The sender of this message could not be validated. Please use caution when opening any message content such as attachments or links**



Good afternoon Emma,

Thank you for the information below that you previously provided to my colleague Susie. This information relates to proposals for a Nationally Significant Infrastructure Project (NSIP).

Having reviewed the available information, we are of the opinion that the project we are involved with will require updates to the currently available modelling. In order to avoid abortive work, we would welcome the opportunity to agree a scope for this modelling work with the Environment Agency in advance. This would need to include agreeing the flood modelling baselines and any specific requirements for modelling under the NSIP process.

We understand that this type of pre-application advice is a paid for service. Please could you prepare the required quotations, etc. so that we can start the process?

We previously had trouble downloading some of the modelling files due to their size. My colleague Chris (cc'd above) will be in contact about sending across a hard drive so that the files can be shared in this way.

Kind regards,

Mark Skivington *BSc (Hons) MSc*  
Associate



**PFA Consulting Ltd**  
Stratton Park House  
Wanborough Road  
Swindon SN3 4HG

E: [redacted]@pfapl.com / T: [redacted]

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---

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Registered address as above.

---

**From:** Edwards, Emma [redacted]@environment-agency.gov.uk>

**Sent:** 10 August 2022 10:56

**To:** Susie Concannon [redacted]n@pfaconsulting.uk>

**Subject:** Your Enquiry: RFI/2022/272419

**Our Ref:** RFI/2022/272419

Dear Susie,

**RE: Provision of Products 4, 5, 6, 7 & 8 for Camblesforth, Selby, North Yorkshire Solar Farm  
Request for information under the Freedom of Information Act 2000 (FOIA) / Environmental Information  
Regulations 2004 (EIR)**

Thank you for your enquiry which was received on 12/07/2022

The requested data is attached. Please also find attached a 'Supporting Information' document which should be read in conjunction with this data.

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**Planning Advice**

If you are using our data to inform a development proposal, we encourage you to contact our Sustainable Places team for pre-planning application advice. Their advice can help you solve key environmental issues early, reduce the chance of an objection, and help you design a more sustainable development for proposed planning applications. If you would like to take advantage of this service, our advisers will be able to provide further information and estimated costs for any detailed advice. Please contact our Sustainable Places Team by e-mail at [REDACTED]@environment-agency.gov.uk for further information.

For general enquiries relating to your development or our role within the planning system, please refer to the attached 'Planning advice for developers' document.

I hope that we have correctly interpreted your request. We respond to requests for recorded information that we hold under the Freedom of Information Act 2000 (FOIA) and the associated Environmental Information Regulations 2004 (EIR).

If you are not satisfied with our response to your request for information you can contact us within 2 calendar months to ask for our decision to be reviewed.

If you require any further help, please do not hesitate to contact me.

Yours sincerely

**Emma Edwards**

Enquiries Officer | Enquiries Team | C&E Department | Yorkshire Area

**Environment Agency**

[REDACTED]@environment-agency.gov.uk

Enquiries Team Tel | [REDACTED]

Enquiries Team Email | [REDACTED]@environment-agency.gov.uk



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**Rebecca Smith**

---

**From:** Edwards, Emma [redacted]@environment-agency.gov.uk>  
**Sent:** 07 September 2022 18:53  
**To:** [redacted]  
**Cc:** [redacted]  
**Subject:** RE: Your Enquiry: RFI/2022/272419

Hi Susie,

Please find a new sharefile link below for the outputs (P6):

[redacted]

Please also note the following:

The 0.1% +20% Climate Change scenario was not run for the 2016 Upper Humber model, the available scenarios include:

**Defended**, (10, 30, 75, 100, 200, 1000)

**Undefended**, (10, 30, 75, 100, 200, 1000)

**Breach**, (100 (fluvial) and 200 (tidal)) for 18 locations

Kind regards,  
**Emma Edwards**  
Enquiries Officer | Enquiries Team | C&E Department | Yorkshire Area  
**Environment Agency**  
[redacted]@environment-agency.gov.uk  
Enquiries Team Tel | [redacted]  
Mobile | [redacted]  
Enquiries Team Email | [redacted]@environment-agency.gov.uk



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From: Susie Concannon [redacted]@pfaplc.com>  
Sent: 06 September 2022 09:35  
To: Edwards, Emma [redacted]@environment-agency.gov.uk>  
Cc: 'Mark Skivington' [redacted]@pfaplc.com>  
Subject: RE: Your Enquiry: RFI/2022/272419

Good Morning Emma,

Having reviewed the data, it appears the flood extents for the 1 in 200 + cc is missing data and 1 in 1000 + cc files are missing for the 2016 Upper Humber Study. Is it possible to provide the flood extents?

Regards,

Susie Concannon  
Assistant Engineer



PFA Consulting Ltd  
Stratton Park House  
Wanborough Road  
Swindon SN3 4HG

[redacted]@pfaplc.com / T: [redacted]

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---

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---

From: Edwards, Emma <[redacted]s@environment-agency.gov.uk>  
Sent: 18 August 2022 15:01  
To: Susie Concannon [redacted]@pfaplc.com>  
Subject: RE: Your Enquiry: RFI/2022/272419

Hi Susie,

Please see below reply from our team:

*Please try the following:*

*When you open the Sharefile link, rather than ticking 'Select All', you can click within each folder to split the data into smaller and more manageable parts. In the top left corner of each subsequent folder is a tick box. Tick this box (rather than ticking the 'Select All'), the folder can then be downloaded.*

*You can choose how far into each folder you delve, however the further in, the smaller the chunks of data will be and therefore the download is more likely to be successful.*

Kind regards,

**Emma Edwards**

Enquiries Officer | Enquiries Team | C&E Department | Yorkshire Area

**Environment Agency**

██████████ [@environment-agency.gov.uk](mailto:██████████@environment-agency.gov.uk)

Enquiries Team Tel | ██████████

Enquiries Team Email | ██████████ [@environment-agency.gov.uk](mailto:██████████@environment-agency.gov.uk)



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---

**From:** Susie Concannon <██████████@pfapl.com>

**Sent:** 16 August 2022 08:42

**To:** Edwards, Emma ██████████ [@environment-agency.gov.uk](mailto:██████████@environment-agency.gov.uk)>

**Subject:** RE: Your Enquiry: RFI/2022/272419

Good morning Emma,

Thankyou for providing the information we requested for this.

We have managed to download all the data, except for the model (the upper humber model) we seem to be running into an error where it will start to download it only to restart again and again so the data doesn't seem to download at all – would it be possible for us to send over a hard drive for you to put the data on?

If not do you have any alternatives for how we can download the model data?

Kind Regards,

Susie Concannon  
Assistant Engineer



PFA Consulting Ltd  
Stratton Park House  
Wanborough Road  
Swindon SN3 4HG

E: [redacted]@pfapl.com / T: [redacted]

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Registered address as above.

**From:** Edwards, Emma [redacted][s@environment-agency.gov.uk](mailto:[redacted]@environment-agency.gov.uk)>  
**Sent:** 10 August 2022 13:02  
**To:** Susie Concannon [redacted][n@pfapl.com](mailto:[redacted]@pfapl.com)>  
**Subject:** RE: Your Enquiry: RFI/2022/272419

Hello,

I've spoken with our technical team, and the documents provided contained 'sharefile' links, which should take you to the data you are looking for.

Kind regards,

**Emma Edwards**

Enquiries Officer | Enquiries Team | C&E Department | Yorkshire Area

**Environment Agency**

[redacted][@environment-agency.gov.uk](mailto:[redacted]@environment-agency.gov.uk)

Enquiries Team Tel | 020 847 48174

Enquiries Team Email | [redacted][@environment-agency.gov.uk](mailto:[redacted]@environment-agency.gov.uk)



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**From:** Susie Concannon [REDACTED]@pfapl.com>  
**Sent:** 10 August 2022 12:04  
**To:** Edwards, Emma [REDACTED]@environment-agency.gov.uk>  
**Subject:** RE: Your Enquiry: RFI/2022/272419

Good Morning Emma,

Usually, we expect to receive Product 6, 7 & 8 data in GIS format along with the modelling files, reports, surveys etc where available.

Would you be able to produce this?

Kind Regards,

Susie Concannon  
Assistant Engineer



PFA Consulting Ltd  
Stratton Park House  
Wanborough Road  
Swindon SN3 4HG

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**From:** Edwards, Emma <[REDACTED]s@environment-agency.gov.uk>  
**Sent:** 10 August 2022 10:56  
**To:** [REDACTED]@pfapl.com  
**Subject:** Your Enquiry: RFI/2022/272419

**Our Ref:** RFI/2022/272419

Dear Susie,

**RE: Provision of Products 4, 5, 6, 7 & 8 for Camblesforth, Selby, North Yorkshire Solar Farm  
Request for information under the Freedom of Information Act 2000 (FOIA) / Environmental Information  
Regulations 2004 (EIR)**

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If you are not satisfied with our response to your request for information you can contact us within 2 calendar months to ask for our decision to be reviewed.

If you require any further help, please do not hesitate to contact me.

Yours sincerely

**Emma Edwards**

Enquiries Officer | Enquiries Team | C&E Department | Yorkshire Area

**Environment Agency**

[redacted]@environment-agency.gov.uk

Enquiries Team Tel | [redacted]

Enquiries Team Email | [redacted]e@environment-agency.gov.uk



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## Rebecca Smith

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**From:** Enquiries, Unit [REDACTED]s@environment-agency.gov.uk>  
**Sent:** 12 July 2022 11:34  
**To:** [REDACTED]  
**Subject:** Auto Reply Acknowledgement

Please note this is an auto reply message.

Thank you – the Environment Agency has received your email.

Freedom of Information Act and Environmental Information Regulations state that a public authority must respond to requests for information within 20 working days.

For information on what you can expect from us and our full service commitment to you then please visit our website:

<https://www.gov.uk/government/publications/environment-agency-customer-service-commitment>

If you have made a data request, you may wish to look at [www.data.gov.uk](http://www.data.gov.uk) to see if the data you have requested is available online.

Usually we make no charge for providing information. In some cases we may make a charge for licensed re-use of our data. Where this is the case, we will notify you in advance.

If you have provided any personal information (also called personal data) in your enquiry, the Environment Agency will follow all applicable UK and EU data protection laws in how we treat it. We may use your information to help you with your enquiry, if necessary. More details on your rights and how we will process your personal information can be found in our Personal Information Charter:

<https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter>

### **Environmental Incident**

If your email was to report an environmental incident i.e. pollution, fish in distress, dumping of hazardous waste etc. then please call our **Freephone 24 hour Incident Hotline on 0800 80 70 60**.

For more details about incident reporting please see our website:

<https://www.gov.uk/report-an-environmental-incident>

Kind Regards,

National Customer Contact Centre - Part of National Operations Services

☎ Tel: 03708 506 506

🌐 Web Site: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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## Rebecca Smith

---

**From:** Susie Concannon [REDACTED]@pfapl.com>  
**Sent:** 12 July 2022 11:30  
**To:** [REDACTED]@environment-agency.gov.uk  
**Cc:** [REDACTED]  
**Subject:** E216: CAMBLESFORTH, SELBY, NORTH YORKSHIRE SOLAR FARM - Flood Risk Data Information Request  
**Attachments:** E216-05 - Site Location Plan.pdf; DX\_01\_Site\_Boundary.zip; DX\_01\_Site\_Boundary.dbf; DX\_01\_Site\_Boundary.prj; DX\_01\_Site\_Boundary.shp; DX\_01\_Site\_Boundary.shx

Good Afternoon,

### **E216: CAMBLESFORTH, SELBY, NORTH YORKSHIRE SOLAR FARM – Flood Risk Data Information Request**

PFA Consulting have been commissioned to investigate Flood Risk for an area of land in the vicinity of Camblesforth, Selby. The relevant area of interest is shown on the attached PDF by the red line. The centre of the area of interest, has the National Grid Reference of 461814 , 425733 (SE 61814 25733) I have also attached the redline site boundary in GIS format.

The majority of the land is shown to be within Flood Zones 2 and 3. Please can you provide any information you made hold which would be relevant to this assessment. I am particularly interested in:

**Product 4:** Detailed Flood Risk Assessment Map, including flood zones, defences and storage areas, areas benefiting from defences, statutory main river designations, historic flood event outlines and more detailed information from our computer river models (including model extent, information on one or more specific points, flood levels, flood flows)

**Product 5:** reports, including flood modelling and hydrology reports and modelling guidelines

**Product 6:** Model Output Data, including product 5

- The latest modelled river/flood levels in the vicinity of the application site for the 1:20, 1:100 year, 1:100 year (including an allowance for climate change), and 1:1000 year flood events;
- Details of the hydraulic model (including node locations and any supporting modelling reports);
- Details of any flood defences in the immediate vicinity of the site; and
- Historic flood incidents in the vicinity of the site (from all sources of flooding);

**Product 8:** Flood Defence Breach Hazard Map including, maximum flood depth, maximum flood velocity, maximum flood hazard

### **SEPARATE REQUEST**

**Product 7:** We would also like to request access to the relevant modelling files if available. We understand that providing this could be a more time intensive exercise and would therefore request that this is dealt with separately so as not to delay the provision of the information listed above.

Please let me know if you require any further information to process this flood risk information request.

Kind Regards,

Susie Concannon  
Assistant Engineer



**PFA Consulting Ltd**  
Stratton Park House  
Wanborough Road  
Swindon SN3 4HG

E: [REDACTED]@pfapl.com / T: [REDACTED]

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Company Registered in England 03871018.  
Registered address as above.

Ms Emily Park  
The Planning Inspectorate  
Temple Quay House Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** RA/2022/144544/01-L01  
**Your ref:** EN010140  
**Date:** 04 July 2022

Dear Emily Park

**Scoping Opinion consultation: HELIOS RENEWABLE ENERGY PROJECT -  
SOUTHWEST OF THE VILLAGE OF CAMBLESFORTH, SELBY**

Thank you for your consultation on this scoping opinion request, which we received on 7 June 2022. We have reviewed the 'Environmental Impact Assessment: Scoping Report' prepared for Enso Green Holding D Limited by Barton Willmore now Stantec, reference 33627/A5/Scoping dated June 2022, and have the following advice:

**Flood Risk**

We support that both flood risk and surface water runoff are scoped into the Environmental Statement (ES) and note that a Flood Risk Assessment (FRA) and Drainage Statement (DS) will be produced as part of the ES. The surface water DS should be agreed with both the Lead Local Flood Authority and the IDB. All watercourses within the site boundary are classed as ordinary watercourses. Any watercourse crossings must be agreed with the IDB and may also require consent under the Land Drainage Act 1991.

**Chapter 9 (Water Environment)**

**Flood Zone Classification - Section 9.3.13**

The text states that the site lies within an area which benefits from defences and: "there are some small areas of Flood Zones 3,2 and 1, as shown on Figure 9.2." As much of the site lies within Flood Zone 3, either defended or undefended, we recommend that the text is amended to "there are small areas of undefended flood zone 3, 2 & 1".

**Project Basis for Scoping Assessment - Section 9.4.1**

We support the statements that

- the battery storage will be located outwith the areas affected by a breach of defences
- the solar arrays will be positioned (on piles) above breach levels and that the finished floor level (FFL) of the inverter/transformer station will also be raised above this level.

#### Embedded Mitigation - Section 9.5.1

We note that the FFL of the proposed development will be guided by an FRA and breach depths and will be designed to remain operational during a breach. Also that infrastructure at greatest risk is to be located in areas of the least risk.

As well as ensuring that the proposed development is safe, the FRA will need to clearly demonstrate that the proposed development will not increase or exacerbate flood risk to other. All 3 phases of development will need to take this into account: construction; operation, and decommissioning.

The FRA will also need to take into account the impacts of climate change when assessing flood risk, both to and arising from, the proposed development. We note that the development has a design lifetime of 40 years. As well as taking into account the risk of breach, the FRA should also ensure that the risk of overtopping of defences is reviewed – especially when taking into account the impacts of climate change.

The latest guidance on climate change can be found here:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### Proposed Approach to the ES - Section 9.8.2

We support the statement that the DS will be developed to maintain existing greenfield runoff rates.

We would recommend that the scope for any modelling/breach analysis, required to inform the mitigation required within the FRA or DS is agreed with the Environment Agency and Lead Local Flood Authority respectively.

### **Groundwater and Contaminated Land**

Given the sensitivity of the groundwater in this location, we believe groundwater should be fully considered within the Water Environment chapter alongside surface water bodies.

We are generally satisfied with what has been scoped in/out of the assessment with the exception of 'Groundwater Supply (potential impacts from contamination)' which we believe should be scoped into the assessment.

Groundwater beneath the site is particularly sensitive because it is located upon a Principal Aquifer and is within a Source Protection Zone 3 for groundwater abstraction for Public Water Supply. There may in addition be further private water supplies nearby which will also need to be included in the assessment as they could be impacted by the development. We note the applicant has acknowledged they will request details of private abstractions, but we believe these should also be considered within the Environmental Statement (ES).

We note there will be piling on site. Given the potential for piling to create a pathway between the surface and the groundwater, and the sensitivity of the groundwater on site, the risks associated with this and other construction activities should be considered within the Environmental Statement.

### **Pollution Prevention**

Given the number of waterbodies that are located within and in close proximity to the proposed project's boundary, we are concerned of potential water pollution due to

suspended solids and other pollutants entering controlled waters during pre-operational, operational and decommissioning activities. We appreciate that that the developer has identified potential effects on the water environment during the construction phase. We are pleased that the applicant intends to prepare a Construction Environmental Management Plan (CEMP) and to liaise with the Environment Agency during the Environmental Statement stage.

We would, however, like to advise on the following matters:

### 1. Baseline conditions

The Scoping Report has failed to provide a thorough overview of baseline conditions:

- i. The Scoping Report does not contain a thorough examination of the site's hydrology. Although it has identified that the site lies within the Humber River Basin District and two-surface water operational catchments, Ouse Lower Yorkshire and Aire Lower, it has failed to identify the river waterbody catchments. The site lies within two catchments: The north part of the site lies within the Ouse from R Wharfe to Upper Humber and the south within the Aire from River Calder to River Ouse. Properly identified the hydrology of the site is paramount given that it affects the scope and baseline information of the Environmental Statement.
- ii. The Scoping Report has failed to identify all Water Framework Directive (WFD) waterbodies likely to be affected. The Scoping Report briefly mentions the River Aire and River Ouse, but does not mention, for instance, the Selby Canal west of the site. It also lacks details on the specific characteristics of the waterbodies. Although the report does refer to the WFD status of the River Aire and the River Ouse being 'Moderate', that is only brief with no details as to the reasons for failure.

The Environmental Statement must identify all water features of the study area, including ordinary watercourses. A thorough investigation of the site's hydrology, waterbody and waterbody catchment WFD status and reasons for failing WFD targets, pressures, specific characteristics but also private water supplies and water use must be carried out in order to provide the baseline information for the impact assessment. The applicant must adhere to Baseline Environment - Section 9.3.4 which highlights their intention to obtain further information and data from the Environment Agency 'to inform the impact assessment and will be presented in the ES chapter. This will include a summary of water quality of the identified waterbodies and watercourses, water resources (including pollution incidents, abstraction licences and discharge consents), local fisheries, and detailed flood risk data of the site boundary'.

### 2. Legislation and Policy

The Scoping Report has failed to identify the legislation, policy and guidance that relates to the water environment and which will inform the Environmental Statement

### 3. Impacts during the operational stage have been scoped out.

Although the Scoping Report, chapter 9.6 Likely Significant Effects – Operational Phase – section 9.6.4, identifies potential impacts on water quality during the operational stage, according to table 9.1 these have been scoped out of the Environmental Impact Assessment which will only consider impacts during the construction and the decommissioning stage. We would like the Environmental Statement to assess the potential effects of the project on water quality during its operational phase. This should include impact on water quality from run-off and spillages during maintenance operations in particular when these might include excavations (in case of underground cables). We would also like the Environmental Statement to include an assessment of



the pollution risk as a result of fluid (oil) leakages from underground cables that can cause severe environmental harm.

The Environmental Statement must identify all activities that may give rise to pollution (e.g excavations, vehicle movement), assess the effect of different pollutants and contaminants (e.g sediments, oil) that may enter the water environment and lay down mitigation measures as well as procedures in place to control pollution in the event of an incident.

#### 4.CEMP

We would also like to request that the Environment Agency is given the chance to comment on the CEMP or any other pollution prevention and environment management plan.

The applicant shall be producing a Pollution Management Plan, as part of the CEMP which shall also include among others, provision for environmental awareness training for staff and a contingency plan/emergency response plan should an incident occur.

We trust the above advice is useful.

If we can be of any further assistance, please don't hesitate to contact the Sustainable Places (SP) team.

Yours sincerely

**Mrs Frances Edwards**

Planning Specialist (Humber),  
Sustainable Places (Yorkshire / Lincolnshire & Northamptonshire)

