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Lead Member of the Examining Authority  
National Infrastructure Planning  
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Our ref: AN/2024/135611  
Your ref: EN010142

Date: 20 January 2025

Email:  
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Dear Nicholas

**Order Granting Development Consent for the Tillbridge Solar Project (EN010142) – Issue Specific Hearing 2 submission.**

**1.0 Introduction**

1.1 Your records will show that, on 15 January 2025, the Environment Agency attended Issue Specific Hearing 2 in relation to the proposal by Tillbridge Solar Limited to construct a solar farm to the East of Gainsborough in Lincolnshire.

**2.0 Scope of these representations**

2.1 As you will recall, we were asked questions on the impact on run off for rainwater for a solar farm compared to a green field site, whether the works can be regarded as essential infrastructure and whether the Environment Agency will be maintaining the flood defences in connection with the River Trent that have been referred to in discussions relating to this proposal.

2.2 I wish to confirm and expand on the answers given on these topics as follows:

**3.0 Impact on run off for rainwater for a solar farm compared to a green field site.**

3.1 The explanation given on behalf of the applicant at the Hearing was noted. As advised on 9 December 2024 in our answer to Q1.5.2 in your first questions about the impact on the general hydrological cycle for the area, in general terms, we assess solar farms as having the same run off rate as green field sites as the area underneath the panels is still green field.

3.2 Any more detailed advice on surface water drainage should be sought from the Lead Local flood Authority.

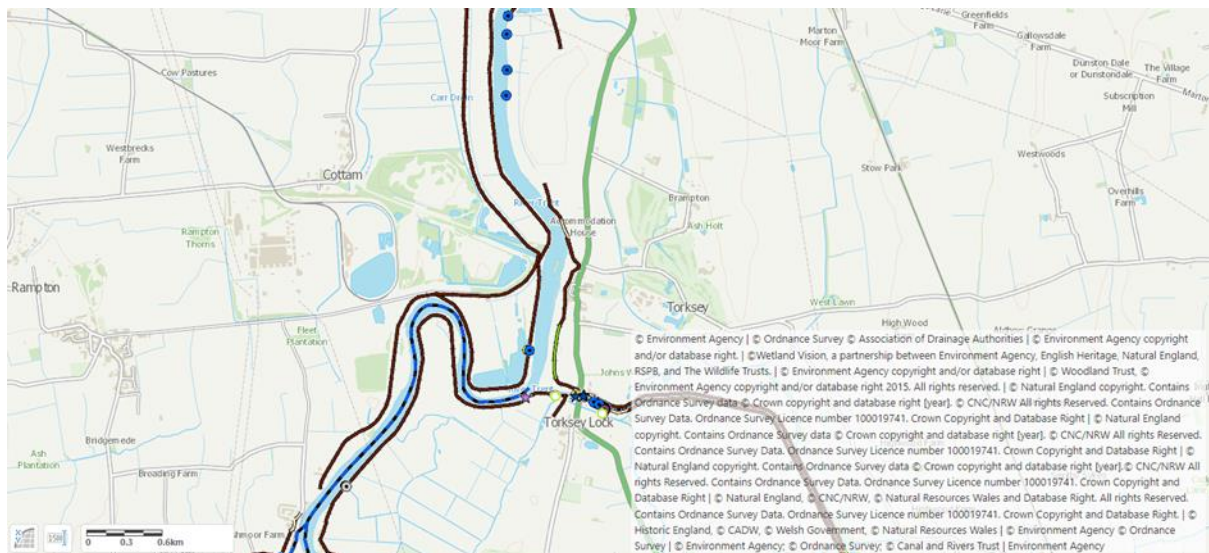
#### 4.0 Essential infrastructure

4.1 As advised, it is considered that the development is classified as Essential Infrastructure under Annex 3 of the National Planning Policy Framework.

4.2 To expand on this, it could be argued that a solar farm contains different elements of vulnerability, i.e. the panels are ‘less vulnerable’ as they will be waterproof, but the substation(s) and battery energy storage systems (BESS) will definitely be vulnerable to flood water and will need to be protected. If the ‘different elements’ argument is to be accepted, the Planning Practice Guidance at paragraph 079, Table 2 footnote, states that “the highest vulnerability category should be used, unless the development is considered in its component parts”. So overall, given the nationally significant scale of Tillbridge Solar, we confirm our view that it should be classified as Essential Infrastructure.

#### 5.0 Maintenance of flood defences.

5.1 The flood defences for the River Trent in the vicinity of the area under discussion are shown by the bold black lines on the map below. There are ones which we informally class as “minor” as they are superseded by a “major” defence behind.



- 5.2 The minor defences do not protect property and would be low priority for us to maintain. However, the major ones behind these supersede them. As advised at the Hearing, this defence line is very important to the Environment Agency and we can commit to maintaining it.
- 5.3 Furthermore, to offer an additional level of comfort, we would add these defences have been in place for at least 50 years, if not longer, and erosion has not been a significant issue so far.
- 5.4 However, separate to discussions which took place at the Hearing, there is an additional point we wish to make you aware of on the topic of flood risk/defences. This relates to a Technical Note prepared by AECOM which forms Annex F to the Flood Risk Assessment (FRA) for this application. The Environment Agency referred to this document in paragraphs 4.5 and 4.6 of our Written Representations dated 6 November 2024 (document reference REP2-010). In the second of these paragraphs, you will note we accepted the AECOM document provided it was submitted to you in the form we had seen. This was a version dated 17 October 2024.
- 5.5 We have noted from the Planning Inspectorate's website that the version submitted by the applicant to you (contained within the FRA submitted at Deadline 3 (document reference REP3-023)) is dated 14 October 2024 and so is not the same document.
- 5.6 We have asked the applicant's consultant what the differences are between the 2 documents. They advise they only relate to some minor changes to text, formatting and DCO application library references. They add all technical outputs, mitigation proposed and conclusions are the same. They say they will update the FRA at Deadline 4 to include the correct version of the technical note (dated 17 October). We will endeavour to check this in due course.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours sincerely

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