

Planning Inspectorate

[via Planning Inspectorate website &

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Our ref: XA/2025/100270/02-L01

Your ref: EN010147

**Registration
Number:** 20055261

Date: 04 June 2025

Dear Sir/Madam,

EXAMINATION DEADLINE 1 – STATEMENT OF COMMON GROUND

BOTLEY WEST SOLAR FARM, OXFORDSHIRE

I write further to the submission of our Relevant Reps, dated 27 Feb 2025.

Due to a lack of a consultation strategy, we have had very little consultation with the developer since our PEIR consultation response, dated 05 February 2024.

As shown within our Work Package Tracker, see appendix 1, we have not been able to work with the developer on agreeing matters raised within our Relevant Representations response and we are not in a position to address these issues within a Statement of Common Ground at this time.

Yours faithfully

Paul Gethins
Planning Specialist – National Infrastructure Team

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Appendix 1 – Environment Agency Work Package Tracker

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Overarching Tracker						
Subject	Topic / Document(s)	Assessment	Impact	Solution	Agreed requirement/ or updated assessment	Environment Agency Relevant Representation Issue Reference
Ecology and Geomorphology	Ecological Assessment / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-001 – Conduct otter and water vole surveys.
	Loss of Habitat / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-002 – Consider the impact of construction and decommissioning on water voles.
	Watercourse metric / Biodiversity Net Gain Statement	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-003 – BNG assessment requires measurement of watercourse and use of metric.
	Habitat Enhancements / Landscape Ecological Management Plan (LEMP)	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-004 – In-channel habitat enhancements needed.

	BNG Monitoring and Enhancements / LEMP	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-005 – Assessments should be done with a plan to deliver watercourse BNG enhancements.
	Buffer Zones / Code of Construction Practice (CoCP)	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-006 - Buffers at minimum of 10m.
	Vibrational Effects / ES, CoCP	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-007 – Consider impacts of noise and vibration on fish. Mitigation measures should be included to make any impacts negligible and detailed in the CoCP.
	Electromagnetic Fields / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-008 – Ensure mitigation is in place so fish cannot detect EMFs from underground cables.
	Loss of Habitat / Water Framework Directive (WFD) Assessment	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-009 – Detail is required on the length of temporary works and size of impact on the channel.

	Unassessed Watercourses / Environmental Statement (ES), LEMP	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-010 - Conduct MoRPh surveys/River Corridor Assessments to establish correct BNG and increase the buffer/easement distance.
	Misassessed Watercourses / ES, LEMP	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFBG-011 - Ensure watercourses are properly assessed.
Flood Risk & Flood Modelling	Inspections and Surveys / ES, DCO	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-001 & EAREQ-001 – Requirement to provide pre-works and post-works survey of the flood assets intersected by the cable crossings with consideration of settlement and adverse effects from vibration. Remediation for defects identified. HDD offsets should be informed by as-built drawings and surveys.
	Horizontal Directional Drilling (HDD) Cable Depth / ES, DCO	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-002 & EAREQ-002 – Requirement to ensure HDD occurs at a minimum cable depth of

						5m below hard bed and flood assets.
	HDD Entry and Exit Pits / ES, DCO	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-003 & EAREQ-003 – Requirement to maximise the distance of the HDD entry and exit pits distances from the watercourse compliant with the local plan for main rivers.
	Placement of Spoil / ES, DCO	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-004 & EAREQ-004 – Requirement to ensure spoil is stored outside the design flood extent and outside of Flood Zone 3b.
	Solar Panel Freeboard / ES, Flood Risk Assessment (FRA), DCO	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-005 & EAREQ-005 – Requirement relating to the solar panel freeboards and a level of 300mm.
	Flood Risk Management / CoCP, Operational Management Plan (OMP), Decommissioning Management Plan (DMP), ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-006 – Flood risk management to be included within the CoCP. EA to be consulted on detailed CoCP, OMP and DMP.

	Decomissioning Phase / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-007 – Uncertainty in decommissioning phase impacts on flood risk. Consult EA/appropriate bodies on the DMP before decommissioning.
	Evidence Gaps / ES, FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-008 – Address evidence-gaps relating to flood risk, notably for watercourse catchments of less than 3km ² and placement of components.
	Flood Zones 3a and 3b / ES, FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-009 – Provide mapping that shows Flood Zones 3a and 3b with proposed components and the cable corridor route. Minimise interaction with Flood Zone 3b.
	Reservoirs / FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-010 – Assess impacts and acceptability of works near reservoirs.

	Incomplete Assessment of Flood Risk / FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-011 – Ensure FRA has comprehensive coverage.
	Temporary Facilities Plan	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-012 – Provide Temporary Facilities Plan relative to fluvial flood risk mapping, including hydraulic modelling and proxies.
	Crossing Schedule	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-013 – Provide a map showing proposed crossings of watercourses within the Crossing Schedule.
	Buffers and Easements / ES, FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFR-014 - Maximize component distance from watercourses, ensuring consistency across the site. Clarify if buffers apply to construction phase works.
	Flood Data / FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-001 – Ensure original assessment using the 1 in 1000- year dataset still remain valid given new Risk of

						Flooding from Surface Water (RoFSW) data.
	Rowel Brook / FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-002 – Consider the flood risk to the development associated with the Rowel Brook.
	Climate Change Allowances / FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-003 – Correct/clarify Central Site reporting error.
	Filchampstead Brook / FRA	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-004 - Undertake further detailed analysis for the Filchampstead Brook and associated tributaries to demonstrate substation resilience.
	Hydraulic Model Sense Checks / Hydraulic Modelling Report	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-005 –Hydraulic modelling sense checks required.
	Lumped Flow Estimation Point / Hydrology Report	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-006 – Lumped flow estimation point required to verify hydraulic model flows.
	Cassington Mill Gauge / Hydrology Report	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-007 – Clarify the rationale for not including

						gauge in the pooling group.
	Model Review and Betterment / Surface Water Modelling Report	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAFM-008 – Provide hydraulic models for review and quantify betterment.
	Policy and Guidance / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-001 – Ensure current guidance and policy is referenced.
	Hydrogeology / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-002 - Provide detail on the anticipated groundwater regime present within the Study Area.
	Sensitivities / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-003 – Detail the relative sensitivity of Groundwater SPZs and public and private groundwater abstraction boreholes.
	Maximum Design Scenario / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-004 – Include Maximum Design Scenario (MDS) for mobilisation of leachate/leachable contaminants from

						Hensington Cutting Landfill.
	Mitigation Measures / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-005 & EAREQ-006 – Requirement relating to the production of a plan to manage unsuspected contamination encountered on site.
	Surface water and Groundwater abstractions / ES	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-007 – All abstraction licenses should be included in the baseline conditions.
	Site Investigation and Monitoring / WFD Assessment	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-008 – Provide confirmation of the proposed scope of site investigation and monitoring.
	Groundwater Dependent Terrestrial Ecosystems (GWDTEs) / WFD Assessment	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-009 – Consider GWDTEs
	Screening / WFD Assessment	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-010 – Screen in temporary dewatering, pollution risk and altered drainage and creating or

						altering pathways for consideration.
	Sampling / Code of Construction Practice (CoCP)	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-011 – Geoenvironmental sampling strategy should be expanded to include representative coverage of areas of pesticides and herbicides use.
	Conaminated Land / Outline Soil Management Plan	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-012 – Should refer to the proposed Contaminated Land and Groundwater Discovery Strategy should evidence of contamination be identified.
	Cables / DMP	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-013 – Confirm the risks posed by residual underground cable infrastructure post-decommissioning and identify mitigation measures.
	Sources of Contamination / Desk Top Study and	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-014 - consider new sources of contamination associated

	Preliminary Risk Assessment					with the Proposed Development
	Groundwater Receptors / Desk Top Study and Preliminary Risk Assessment	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-015 & EAGWCL-017 – Assigning appropriate sensitivity to aquifer groundwater receptors.
	Contamination from Off-Site Sources / Desk Top Study and Preliminary Risk Assessment	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-016 – Reassess the likely groundwater regime within the site and the potential for contaminative impact from offsite sources; in particular, Oxford Airport.
	Grounwater Quality / Desk Top Study and Preliminary Risk Assessment	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGWCL-018 – Account for the potential for impacts to groundwater quality resulting from the Proposed Development, such as contaminant mobilisation via foundation construction and cable installation.
Surface Water Quality	Bentonite/drilling fluid breakout plan / CoCP	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EASWQ-001 & EAREQ-007 – Produce

						bentonite/drilling fluid breakout plan.
Water Resources	Water Supply Strategy / ES, DCO, CoCP, Consents and Licenses Required Under Other Legislation	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAWR-001 – Produce a Water Supply Strategy.
Permitting	Consents Strategy / Consents and Licenses Required Under Other Legislation	Not Agreed	Not Agreed	Not Agreed	Not Agreed	EAGCC-001 – Review the Consents and Agreements Position Statement document and further consider what is required.