



Botley West Solar Farm

Statement Of Common Ground –
The Environment Agency

EN010147/APP/11.7/3 Rev 2

20 October 2025

NPI-12426
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The Environment
Agency
V2
20 10 2025

Approval for issue

20 October 2025

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OVER-ARCHING TRACKER									
Subject	Work package	Topic/ Documents	EA Issue	Scope	Method and Assump tions	Results of Assessment (i.e. Impact)	Mitigation / Enhanceme nts Agreed	EA comments	RPS comments
Ecology and Biodiversity	Biodiversity Net Gain Statement	Watercourse Metric / Biodiversity Net Gain Statement	EAFBG-003 – BNG assessment requires measurement of watercourse and use of metric.					In a meeting on 27/07/2025, the Applicant stated that MoRPH surveys are being completed on all watercourses and updated BNG with watercourse module completed to be submitted at Deadline 4/5. We are still awaiting this information as the updated BNG document and oLEMP do not have results of Morph surveys calculation of watercourse metric or suggestions for possible enhancements.	An updated ES Appendix 9.13 Biodiversity Net Gain Assessment has been submitted at Deadline 6 that includes full river MoRPH and ditch condition assessments and associated watercourse BNG calculations. This shows the Project will provide at least 20% watercourse BNG.
	Ecological Assessment	Ecological Assessment / ES	EAFBG-001 – Conduct otter and water vole surveys.					Agreed In the meeting on 27/07/2025 the Applicant agreed to update wording of CoCP with respect to pre-commencement surveys to explicitly refer to otter/water voles, as required. P.11 of oCoCP includes this.	
		Loss of Habitat / ES	EAFBG-002 – Consider the impact of construction and decommissioning on water voles.					Agreed In the meeting on 27/07/2025 the Applicant's method for the protection of water vole during both construction and decommissioning is via the protection of appropriate buffers along watercourses. All watercourses will now have at least a 10m buffer on them from bank top to works areas. This detail looks to have been provided on p.12 oCoCP.	
	Landscape Ecological Management Plan (LEMP)	Habitat Enhancements / Landscape Ecological Management Plan (LEMP)	EAFBG-004 – In- channel habitat enhancements needed.					In the meeting on 27/07/2025 the Applicant stated that the project Order limits do not include the River Evenlode channel itself and, as such, works within the channel are not being considered as part of the Corridor enhancement. We have requested an update on this and what have the	An updated ES Appendix 9.13 Biodiversity Net Gain Assessment has been submitted at Deadline 6 that includes full river MoRPH and ditch condition assessments and associated watercourse BNG calculations. This shows the Project will provide at least 20% watercourse BNG.

								applicants have found from site visits and recent Morph surveys that they could propose as enhancements.	
		BNG Monitoring and Enhancements / LEMP	EAFBG-005 – Assessments should be done with a plan to deliver watercourse BNG enhancements.					In a meeting on 27/07/2025, the Applicant stated that MoRPH surveys are being completed on all watercourses and updated BNG with watercourse module completed to be submitted at Deadline 4/5. The updated BNG document and oLEMP still do not have results of Morph surveys calculation of watercourse metric or suggestions for possible enhancements. Whilst the current version of LEMP says no net gain for watercourses being targeted we require further information around proposed enhancements.	An updated ES Appendix 9.13 Biodiversity Net Gain Assessment has been submitted at Deadline 6 that includes full river MoRPH and ditch condition assessments and associated watercourse BNG calculations. This shows the Project will provide at least 20% watercourse BNG.
		Unassessed Watercourses / Environmental Statement (ES), LEMP	EAFBG-010 - Conduct MoRPH surveys/River Corridor Assessments to establish correct BNG and increase the buffer/easement distance.					In a meeting on 27/07/2025, the Applicant stated that MoRPH surveys are being completed on all watercourses and updated BNG with watercourse module completed to be submitted at Deadline 4/5. The updated BNG document and oLEMP still do not have results of Morph surveys calculation of watercourse metric or suggestions for possible enhancements. Additionally, the applicant mentioned ditches but they are not included in the BNG metric. Unless they are ditches associated with hedges they should be included and form part of the watercourse metric. Ditches will be subject to monitoring to BNG Target, "12.3 Ditches: 12.3.1 A ditch Statutory Metric Condition Assessment Sheet (Natural England, 2023) will be filled out per parcel of ditch within the site. The habitat condition score will subsequently be calculated and compared with the BNG Target."	An updated ES Appendix 9.13 Biodiversity Net Gain Assessment has been submitted at Deadline 6 that includes full river MoRPH and ditch condition assessments and associated watercourse BNG calculations. This shows the Project will provide at least 20% watercourse BNG.

		Mis-assessed Watercourses / ES, LEMP	EAFBG-011 - Ensure watercourses are properly assessed.					Agreed In a meeting 27/07/2025 the Applicant stated that the Rowel Brook is to be fully protected through the implementation of an appropriate buffer (now 10m) and control measures set out in the CoCP with respect to pollution prevention. We note there are now 10m buffers for existing ordinary watercourses.	
	Code of Construction Practice (CoCP)	Buffer Zones / Code of Construction Practice (CoCP)	EAFBG-006 - Buffers at minimum of 10m.					In a meeting on 27/07/2025 the Applicant agreed to 10m buffers. However, the current version of LEMP says no net gain for watercourses being targeted.	
		Vibrational Effects/ ES, CoCP	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.					Agreed The Applicant agreed to update oCoCP and drilling strategy to explicitly state timing will avoid spawning period unless impact can be avoided through detailed design of the HDD route and associated noise propagation assessment. Agree with paragraph 1.10.8 on page 11 oCoCP.	
	Environmental Statement	Electromagnetic Fields / ES	EAFBG-008 – Ensure mitigation is in place so fish cannot detect EMFs from underground cables.					Agreed In response to the submitted technical note we are now satisfied that if they bury their cables to at least 10m or deeper below the river depth then this will be acceptable in mitigating any impacts on fish from EMF.	
	Water Framework Directive (WFD) Assessment	Loss of Habitat / Water Framework Directive (WFD) Assessment	EAFBG-009 – Detail is required on the length of temporary works and size of impact on the channel.					Further detail is required on the length of temporary works and size of impact on the channel along with information on what is classed as best practice. We note that Table 5.4 has been updated to show that this activity is scoped in. Further detail is required in the oCEMP as to how potential impacts on fish from this activity will be mitigated. Notably, will there be a fish rescue? will works happen when channels are dry? will the location of dewatering have a fish population and/or habitat suitable for fish?	

Water Resources	Water Supply Strategy	Water Supply Strategy / ES, DCO, CoCP, Consents and Licenses Required Under Other Legislation	EAWR-001 – Produce a Water Supply Strategy.					Agreed The applicant has confirmed that mains water supply is intended to cover all demands and/or off-site supply (tankering and/or use of bowsers). Commitment to produce a water supply strategy is preferred at pre-application stages to accompany the ES but post issue is proportionate at this stage given supply options intended. It is the applicant's risk if demands and supply options are underestimated and any permitting requirements cause delays pre-commencement on this basis.	<u>N/A</u>
Flood Risk	Flood Risk Assessment	Inspections and Surveys / ES, DCO	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.					Agreed We would need the surveys to be submitted for review to ensure adequate remediation. The Applicant should assess appropriate vibration limits and monitor to ensure these are within safe limits during the works. Investigation into the asset geometry may necessitate site investigation to inform decision-making on design and methodology of works in proximity. The applicant has updated the wording within Environmental Statement Chapter 10: Hydrology and Flood Risk (see Table 10.26, section 10.14, page 71) which is acceptable. However, the DCO must be updated to ensure that the mitigation is secured as a requirement. This has now been committed to on p.18 of Commitments Register and p.16 of oCoCP. We are a named consultee on full CoCP secured by requirement in the DCO.	<u>N/A</u>

		Horizontal Directional Drilling (HDD) Cable Depth / ES, DCO	EAFR-002 & EAREQ-002 – Requirement to ensure HDD occurs at a minimum cable depth of 5m below hard bed and flood assets.					Agreed Note that assets such as sheet piling may need to be implemented during the lifetime of the development so the Applicant would need to allow for this within their design - notably this could be implemented where formal assets do not currently exist. This may be needed due to an increase in flood risk from climate change. The applicant has agreed that a 5 metre depth will be used below watercourses and flood assets. This seems acceptable and the ES, commitments register and oCoCP have been updated to include 5m depth.	<u>N/A</u>
		HDD Entry and Exit Pits / ES, DCO	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.					Agreed This has been included in ES, commitments register, and oCoCP. The applicant must be mindful of Flood Zone 3b in the choice of entry / exit pit locations, see comments on this matter below (section Flood Zones 3a and 3b / ES, FRA). .	<u>N/A</u>
		Placement of Spoil / ES, DCO	EAFR-004 & EAREQ-004 – Requirement to ensure spoil is stored outside the design flood extent and outside of Flood Zone 3b.					Agreed It is mentioned in ES chapter that spoil outside of FZ3 will be 'secured through requirement'. In the Commitments Register (pp.18-19), this wording has been updated to say this matter has been 'included in the oCoCP'. .	

		Solar Panel Freeboard / ES, Flood Risk Assessment (FRA), DCO	EAFR-005 & EAREQ-005 – Requirement relating to the solar panel freeboards and a level of 300mm.			It is noted that the solar panels are located within Flood Zone 1. However, for clarity, where surface water flood mapping outputs have been used, these represent areas where the Risk of Flooding from Surface Water dataset has been applied as a proxy for fluvial flood risk. This distinction should be clearly articulated in the updated documentation to ensure accurate interpretation of flood risk in relation to the proposed development. The Applicant needs to ensure that all elements of the proposal remain operational in the design event. There may be concerns about uncertainty in the modelling and the consequences to the panels due to impact from debris during a flood event. Notably, the freeboard is applicable to all sensitive components. FRA (Section 7.2.2 page 78) suggests a freeboard of 300mm to a lower leading edge of 800mm above ground level. The Commitments Register (page 12) and FRA (section 4.4.25 page 56) state 800mm above ground level for the lower leading edge - we believe this should be 900mm to ensure that 300mm freeboard is achieved throughout the site. We are seeking a lower leading edge of 900mm. FRA (section 3.5.4, page 47) suggests that the solar panels may be reached / submerged in a flood event - this would not be acceptable. It should be acknowledged that the flood risk is fluvial where surface water modelling has been used as a proxy because this may have further consequences within our remit such as compensatory flood storage and impact to third parties. Please note: Following the change in the order limits there is additional solar panelling in the area formerly known as Works No 8. This coincides with unmapped flood risk and there	<u>An updated FRA has been submitted [Revision 2] to provide further clarity to reference 900mm being used where there is up to 600mm of flood risk. This is also reflected in an updated 7.7 Outline Layout and Design Principles (Rev 5)</u> <u>Please note solar panels are excluded from 1000 year extents associated with ordinary watercourses, in line with the agreed approach.</u> <u>The updated documents have been submitted at DL6.</u> <u>Regarding the change in order limits separate technical notes have been proevided as part of the Change request detailing risk and associated mitigation.</u>
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								must be consideration of freeboard following a proportional assessment to estimate the design flood level in this area too	
		Flood Risk Management / CoCP, Operational Management Plan (OMP), Decommissioning Management Plan (DMP), ES	EAFR-006 – Flood risk management to be included within the CoCP. EA to be consulted on detailed CoCP, OMP and DMP.					Chapter 10 of the Environmental Statement has been updated to address the issue. The applicant has updated the draft DCO but the relevant commitment on page 40 is unchanged. The Environment Agency should also be named a consultee for operation and decommissioning management plans.	<u>RPS has added the EA as a consultee for detailed operation and decommissioning management plans, included in the Outline plans at DL6.</u>

		Decommissioning Phase / ES	EAFR-007 – Uncertainty in decommissioning phase impacts on flood risk. Consult EA/appropriate bodies on the DMP before decommissioning.					We acknowledge the operational lifetime of the development and agree in principle with the requirement within the DCO that secures this. This requirement must ensure the development is fully decommissioned by 2069 at the latest. Regarding requirement 14 (6) please include the Environment Agency as a relevant consultee. For example: <i>“No decommissioning works must be carried out until the relevant planning authority, in consultation with the Environment Agency, has approved the decommissioning plan”.</i>	<u>RPS has added the EA as a consultee for detailed operation and decommissioning management plans, included in the Outline plans at DL6.</u>
		Evidence Gaps / ES, FRA	EAFR-008 – Address evidence-gaps relating to flood risk, notably for watercourse catchments of less than 3km ² and placement of components.					This should be assumed as a proxy for Flood Zone 3. How does this affect the design flood level (e.g., substation and solar panels), compensatory flood storage, etc. Whilst we agree in principle, we are awaiting the updated mapping and substation configuration plan. We acknowledge and welcome that the substation has been relocated outside of the surface water flow pathway, however, we note that the top north eastern edge of the updated substation extent appears to just clip the Risk of Flooding from Surface Water extent. The applicant should confirm that all infrastructure and ground raising for the substation will be located outside of the Risk of Flooding from Surface Water extent here.	<u>Awaiting EA review on change request documents; no further comment at this stage.</u>

		Flood Zones 3a and 3b / ES, FRA	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.					The Swinford HDD entrance pits are shown to be within the extent of Flood Zone 3b within the West Oxfordshire Strategic Flood Risk Assessment. The latest Risk of Flood from Rivers and Sea (RoFRS) dataset shows the chance of flooding from rivers and the sea considering the presence and condition of flood defences. The Swinford HDD entrance pits are at a high-risk classification based on this dataset. A high-risk classification has a greater than or equal to 1 in 30 (3.3%) chance of flooding in any year. I would suggest using the Risk of Flooding from Rivers and Sea dataset for informing the risk to the entrance pits rather than solely the outlines from the River Thames as the RoFRS dataset will incorporate the risk from other watercourses as well such as the lower River Evenlode. In addition to the modelled outlines, the Swinford HDD crossing entrance pits are also shown to be within the Winter 2013/14 recorded flood extent, January 2003 recorded flood extent, and the Winter 2000 recorded flood extent. Given the location of the entrance pits within a high-risk flood area, there is also potential for flood flow routes through the HDD tunnel to the opposite bank of the Thames. The applicant should assess this risk and clearly outline the mitigation measures. The applicant will need to review this with respect to the Swinford HDD entrance pit and provide written justification as to why the entrance pit cannot be moved outside of functional floodplain. In such cases, appropriate mitigation measures must be presented to manage and reduce flood risk. It is important to note that mitigation measures may remain relevant even if the HDD entrance and exit pits are located within Flood	RPS has prepared a technical note addressing the concerns regarding Swinford Bridge Crossing [REF: 17.9], this has been submitted at DL6.
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								Zone 3a, as this is still an area at risk of flooding.	
		Reservoirs / FRA	EAFR-010 – Assess impacts and acceptability of works near reservoirs.					Clarify minimum distance and whether this will be safe for the Farmoor reservoir embankments. With the substation moving closer to the reservoir, we would seek assurance from the Thames Water that this is acceptable The proposal may change the risk category of the reservoir, clarify this matter.	RPS have provided additional comments in the updated Outline CoCP at DL5. Awaiting EA review no further comments at this stage.
		Incomplete Assessment of Flood Risk / FRA	EAFR-011 – Ensure FRA has comprehensive coverage.					Agreed	N/A

		Temporary Facilities Plan	EAFR-012 – Provide Temporary Facilities Plan relative to fluvial flood risk mapping, including hydraulic modelling and proxies.					Agreed The applicant has provided Figure 13.9 Temporary Facilities, Cable Corridor and Flood Map Plan. Please note, comments with regards to HDD crossings where entrance pits are within Flood Zone 3a and 3b (Flood Zone 3a and 3b/ES, FRA) remain valid.	<u>N/A</u>
		Crossing Schedule	EAFR-013 – Provide a map showing proposed crossings of watercourses within the Crossing Schedule.					Agreed Crossings shown in Figure 13.8 Water Crossing Plan are acceptable	<u>N/A</u>
		Buffers and Easements / ES, FRA	EAFR-014 - Maximize component distance from watercourses, ensuring consistency across the site. Clarify if buffers apply to construction phase works.					In Table 10.26, reference 10.2 of Chapter 10: Hydrology and Flood Risk, a 10-metre buffer is described in relation to permanent development adjacent to Main Rivers. It is unclear whether this buffer also applies to temporary development. This should be clarified within the documentation.	<u>RPS have updated the CoCP to reference 'temporary' and 'permanent' works. An updated version of Chapter 10, Hydrology and Flood Risk chapter has also been provided, reflecting this change. This has been submitted at DL6.</u>
		Flood Data / FRA	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.					Agreed	<u>N/A</u>
		Rowel Brook / FRA	EAFM-002 - Undertake an assessment of flood risk for the upper reaches of the Rowel Brook.					Agreed Note: Please refer to the previous comment EAFR-005 & EAREQ-005 regarding the available freeboard above the design flood level. For avoidance of doubt it should be made clear that all solar panels will be 300mm above the design flood level	<u>N/A</u>

		Climate Change Allowances / FRA	EAFM-003 – Correct/clarify Central Site reporting error.					Agreed A number of comments were raised on the detailed hydraulic modelling an hydraulic modelling report which RPS produced for the River Evenlode and associated tributaries. Since these comments were raised the site layout has been reconfigured so that all solar panels fall within Flood Zone 1 and outside the design flood extent for the River Evenlode. This is considered reasonable and hence comments raised on the detailed hydraulic modelling no longer require action.	N/A
		Filchampstead Brook / FRA	EAFM-004 - Undertake further detailed analysis for the Filchampstead Brook and associated tributaries to demonstrate substation resilience.					The analysis of flood risk for the Filchampstead Brook is reasonable so this can be Agreed, however we will await to review the revised substation layout at deadline 5 to ensure the Main Substation be designed so that it is above the design flood level with a 600mm allowance for freeboard. Furthermore, flood risk impacts from any raising of the main substation platform so that it sits about the design flood level will need to be assessed.	<u>Awaiting EA review on change request documents, no further comment at this stage.</u>
	Hydraulic Model	Hydraulic Model Sense Checks / Hydraulic Modelling Report	EAFM-005 –Hydraulic modelling sense checks required.					Agreed A number of comments were raised on the detailed hydraulic modelling an hydraulic modelling report which RPS produced for the River Evenlode and associated tributaries. Since these comments were raised the site layout has been reconfigured so that all solar panels fall within Flood Zone 1 and outside the design flood extent for the River Evenlode. This is considered reasonable and hence comments raised on the detailed hydraulic modelling no longer require action.	N/A

		Lumped Flow Estimation Point / Hydrology Report	EAFM-006 – Lumped flow estimation point required to verify hydraulic model flows.					Agreed A number of comments were raised on the detailed hydraulic modelling an hydraulic modelling report which RPS produced for the River Evenlode and associated tributaries. Since these comments were raised the site layout has been reconfigured so that all solar panels fall within Flood Zone 1 and outside the design flood extent for the River Evenlode. This is considered reasonable and hence comments raised on the detailed hydraulic modelling no longer require action.	<u>N/A</u>
		Cassington Mill Gauge / Hydrology Report	EAFM-007 – Clarify the rationale for not including gauge in the pooling group.					Agreed A number of comments were raised on the detailed hydraulic modelling an hydraulic modelling report which RPS produced for the River Evenlode and associated tributaries. Since these comments were raised the site layout has been reconfigured so that all solar panels fall within Flood Zone 1 and outside the design flood extent for the River Evenlode. This is considered reasonable and hence comments raised on the detailed hydraulic modelling no longer require action.	<u>N/A</u>
		Model Review and Betterment / Surface Water Modelling Report	EAFM-008 – Provide hydraulic models for review and quantify betterment.					Agreed A number of comments were raised on the detailed hydraulic modelling an hydraulic modelling report which RPS produced for the River Evenlode and associated tributaries. Since these comments were raised the site layout has been reconfigured so that all solar panels fall within Flood Zone 1 and outside the design flood extent for the River Evenlode. This is considered reasonable and hence comments raised on the detailed hydraulic modelling no longer require action.	<u>N/A</u>

Water Quality	Outline Construction Environmental Management Plan	Bentonite/ drilling fluid breakout plan / CoCP	EASWQ-001 & EAREQ-007 – Produce bentonite/drilling fluid breakout plan.					Bentonite Breakout Plan looks sufficient, providing that they add an additional paragraph about training.” This is to ensure staff onsite have sufficient training to recognise and deal with a bentonite breakout.	<u>The Principal Contractor will organise appropriate training for all onsite staff including:</u> • <u>checking for signs of breakout to the surface; and</u> • <u>implementing the response detailed within the Outline Bentonite Breakout Plan.</u> <u>Training to staff will be communicated through toolbox talks.</u>
Groundwater Protection	Environmental Statement	Policy and Guidance / ES	EAGWCL-001 – Ensure current guidance and policy is referenced.					DL5 issue of Chapter 11 still does not refer to Water Supply (Water Quality) (Amendment) Regulations 2018, the Environment Agency's Approach to Groundwater Protection 2018 or Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019. These are all referenced in July 2025 version of Chapter 10.	<u>The assessments within Chapter 11 have paid due regard to the referenced legislation and guidance. All relevant Scheme documentation will be in accordance with these going forwards.</u>
		Hydrogeology / ES	EAGWCL-002 - Provide detail on the anticipated groundwater regime present within the Study Area.					Agreed Section 11.6.22 and Table 11.14 now provide outline summary information on shallow groundwater.	<u>N/A</u>
		Sensitivities / ES	EAGWCL-003 – Detail the relative sensitivity of Groundwater SPZs and public and private groundwater abstraction boreholes.					Agreed We note Ch11 Table 11.14 now includes licensed and private abstractions as a High sensitivity receptor.	<u>N/A</u>
		Maximum Design Scenario / ES	EAGWCL-004 – Include Maximum Design Scenario (MDS) for mobilisation of leachate/leachable contaminants from Hensington Cutting Landfill.					Table 11.16 (previously 11.15) has not been updated yet. The potential for leachate generation from Hensington Cutting Landfill Site is still not included within in Table 11.16.	<u>Hensington Cutting Landfill is located at a cable crossing point. Although not identified within Table 11.16 the potential mobilisation of leachate associated with this potential source is assessed within paragraph 11.9.9 of Chapter 11. Should a potential source-pathway-receptor linkage be identified on completion of the proposed ground investigation, HDD will be progressed below the landfill mass with its construction method supported by the findings of the ground investigation (and subsequent risk assessment) (Commitment 11.2 of the Commitments Schedule [APP-129]).</u>

		Mitigation Measures / ES	EAGWCL-005 & EAREQ-006 – Requirement relating to the production of a plan to manage unsuspected contamination encountered on site.					The applicant has confirmed a discovery strategy is proposed, but a remediation strategy would be prepared as determined by Commitment 11.3. To be added into CoCP by applicant. No changes are visible in Table 11.16 - the measures should clearly state that remediation would be carried out as required in a pollution event. The updated draft DCO does not include the recommended Requirement for managing unsuspected contamination. Commitment 11.3 should be amended to include a remediation strategy if significant soil or groundwater contamination occurs during the Project.	<u>The Discovery Strategy is provided as Commitment 11.1. The purpose of a remediation strategy is to address any significant soil or groundwater contamination. Commitment 11.3 includes the remediation strategy should remediation be required based on the ground investigation or discovery strategy findings.</u> <u>Reference to the Discovery Strategy is provided in Table 1-1 and paragraph 1.10.47 of the CoCP. Reference to the Remediation Strategy is provided in paragraph 1.10.48 of the CoCP.</u>
		Surface water and Groundwater abstractions / ES	EAGWCL-007 – All abstraction licenses should be included in the baseline conditions.					Agreed We are pleased to see that previously missing licenced abstraction outline details have been updated in Appendix 10.6. We note the appendix and accompanying Figure 10.12 do not clearly differentiate between licenced and private abstractions. The groundwater abstraction record we hold within the study area is captured on the figure and appendix. Differentiating which abstractions are licensed and unlicensed is not essential.	<u>N/A</u>
	Water Framework Directive Assessment	Site Investigation and Monitoring / WFD Assessment	EAGWCL-008 – Provide confirmation of the proposed scope of site investigation and monitoring.					Agreed We are pleased to see that proposals to carry out groundwater monitoring have been added into the ES Chapter and look forward to reviewing the proposed ground investigation and monitoring scope when available. We are satisfied that details can be provided at detailed design stage.	<u>N/A</u>
		Groundwater Dependent Terrestrial Ecosystems (GWDTEs) / WFD Assessment	EAGWCL-009 – Consider GWDTEs					We are pleased to see GWDTEs have been identified in the updated WFD Assessment (Appendix 10.7). Two GWDTEs are now identified in the assessment, Wytham Woods SSSI and Rushy Meadows SSSI. These	<u>Ecologically sensitive sites have been considered within the Conceptual Site Models presented for each Land Parcel. The relevant documents are [APP-178] (Rushy Meadows) and [APP-191] (Wytham Woods).</u> <u>In summary the following comments are made:</u>

								should also be subject to assessment as sensitive receptors in Chapter 11 of the ES.	<u>Rushy Meadows</u> Located >500 m east of the BW Solar Farm. Low contamination source potential in these land parcels and limited migration pathways (shallow foundations for structures at this location and discontinuous granular superficial deposits). <u>Wytham Woods</u> Located adjacent to the BW Solar Farm. Low contamination source potential at this location and limited migration pathways (shallow cable trenches and HDD beneath the River Thames) where geology comprises Alluvium present north of the River Thames and underlying bedrock of the Oxford Clay and West Walton Formations.
		Screening / WFD Assessment	EAGWCL-010 – Screen in temporary dewatering, pollution risk and altered drainage and creating or altering pathways for consideration.					Agreed We are pleased that these pathways have been screened in for further assessment in the updated WFD Assessment.	N/A
	Desk Top Study and Preliminary Risk Assessment	Sources of Contamination / Desk Top Study and Preliminary Risk Assessment	EAGWCL-014 - consider new sources of contamination associated with the Proposed Development					Agreed The Desk Top Study and Preliminary Risk Assessment has not been updated at the time of review. We acknowledge they are not part of the remit of PRA/Desk Study and agreed during call with Applicant 21/08/25	N/A
		Contamination from Off-Site Sources / Desk Top Study and Preliminary Risk Assessment	EAGWCL-016 – Reassess the likely groundwater regime within the site and the potential for contaminative impact from offsite sources; in particular, Oxford Airport.					Agreed Section 11.6.6 discusses Oxford Airport and rationale for discounting plausible Source-Pathway-Receptor linkage in the area of the Proposed Development adjacent to this feature.	N/A
		Groundwater Receptors / Desk Top Study and Preliminary Risk Assessment	EAGWCL-015 & EAGWCL-017 – Assigning appropriate sensitivity to aquifer groundwater receptors.					Agreed Discussed with Applicant in meeting 10/09/2025. Agreed approach is that the Applicant will refine the Conceptual Site Model based on further risk assessment carried out following ground investigation. Groundwater impacts to be mitigated via CoCP documentation including PPP	N/A

								and construction drainage design.	
		Groundwater Quality / Desk Top Study and Preliminary Risk Assessment	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.					Agreed Discussed with applicant in meeting 10/09/2025. Agreed approach is for update to Preliminary Risk Assessment and Conceptual Site Model following ground investigations, to be carried out post-consent.	<u>N/A</u>
	Code of Construction Practice (CoCP)	Sampling / Code of Construction Practice (CoCP)	EAGWCL-011 Geoenvironmental sampling strategy should be expanded to include representative coverage of areas of pesticides and herbicides use.					Agreed The need for wider herbicide and pesticide testing was discussed and removed from the scope in meeting with applicant on 10 Sept 2025. Land Parcel 14 (Botley South) has elevated risk due to historic use as an orchard however is directly underlain by Oxford Clay Formation (unproductive strata), and substations located away from potential areas of agrochemical storage (i.e. farm complexes).	<u>N/A</u>
	Decommissioning Management Plan	Cables / Decommissioning Management Plan	EAGWCL-013 – Confirm the risks posed by residual underground cable infrastructure post-decommissioning and identify mitigation measures.					Agreed Discussed at meeting with applicant on 10 Sept 2025. Applicant confirmed that most PV infrastructure including cabling, PV modules, mounting structures, inverters and transformers would be removed from site. Cables will be armoured/sheathed as per industry standard where directional drilling used. Some below ground components may be left in-situ at decommissioning stage if removal would result in greater environmental impact; to be determined in advance of decommissioning stage in accordance with best practice at that time. We have encouraged the developer to consider designing subsurface cable	<u>N/A</u>

								infrastructure to best enable removal should this be determined necessary.	
	Outline Soil Management Plan	Contaminated Land / Outline Soil Management Plan	EAGWCL-012 – Should refer to the proposed Contaminated Land and Groundwater Discovery Strategy should evidence of contamination be identified.					Agreed Section 9.5.19 of the Soil Management Plan references the Contaminated Land and Groundwater Discovery Strategy.	<u>N/A</u>
Permitting	Consents Strategy / Consents and Licenses Required Under Other Legislation		EAGCC-001 – Review the Consents and Agreements Position Statement document and further consider what is required.					Agreed Disapplication and Protective Provisions have been agreed.	<u>N/A</u>