

Springwell Solar Farm

Statement of Common Ground - Environment Agency

EN010149/APP/8.5.2
Version 2
Deadline 3
August 2025
Springwell Energyfarm Ltd

Rule 8 (1)(e)
Planning Act 2008
Infrastructure Planning (Examination
Procedure) Rules 2010

1. Introduction

1.1. Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the application for the proposed Springwell Solar Farm Development Consent Order (the Application) made by Springwell Energyfarm Ltd (the Applicant) to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 Springwell Solar Farm is a proposed new solar farm and battery storage facility located in North Kesteven, Lincolnshire. The proposals also include infrastructure to connect Springwell to the National Grid, as well as any necessary supporting site infrastructure and environmental mitigation, including landscaping and ecological planting (the Proposed Development).
- 1.1.3 This SoCG is submitted to the Examining Authority as final position between both parties.

1.2. Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and Environment Agency (EA).
- 1.2.2 The EA is a statutory consultee, as a prescribed consultee by Applicants under S.42 of the Planning Act 2008 and The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, Regulations 3, Schedule 1.
- 1.2.3 The EA regulates certain activities that have the potential to harm the environment and people. It decides if relevant environmental permits and other consents and licences should be issued and, if so, what conditions should be applied. It monitors compliance with the permit/licence conditions and takes enforcement action if appropriate.
- 1.2.4 The EA is a competent authority for the purposes of certain environmental regulatory frameworks (other than when the Planning Act 2008 directs otherwise) and it also maintains an overview of risks to people and the environment from flooding.
- 1.2.5 The EA has a statutory remit regarding the risk of flooding from main rivers and the sea. Its role also covers various topics including:
 - Regulating major industry and waste;
 - Treatment of contaminated land;
 - Water quality and resources;
 - Fisheries; and
 - Conservation and ecology of the aquatic environment.
- 1.2.6 The EA will appraise the standard of flood risk assessments and consider whether future climate risks have been appropriately considered. For flood risk from other sources (e.g. ordinary watercourses, surface water, groundwater and reservoirs), the Lead Local Flood Authority is the relevant statutory consultee and should be consulted for advice.

- 1.2.7 The above matters of interest discussed with the EA are detailed in **Section 4** of this SoCG. The EA also has a role as the regulator for the Environmental Permitting regime and is responsible for granting, regulating and enforcing Environmental Permitting requirements for any installation that requires an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).
- 1.2.8 Collectively, the Applicant and EA are referred to as ‘the parties.’

1.3. Purpose of this document

- 1.3.1 This SoCG is being submitted to the Examining Authority as a final position between both parties.
- 1.3.2 The SoCG has been prepared in accordance with the Department for Levelling Up, Housing and Communities’ Guidance on the examination stage for Nationally Significant Infrastructure Projects (DLUHC Guidance)¹.
- 1.3.3 Paragraph 007 of the DLUHC Guidance comments that:
- “A SOCG is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at the examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority”.*
- 1.3.4 The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between the EA and the Applicant on matters relating to the Application.
- 1.3.5 The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and the EA.
- 1.3.6 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.
- 1.3.7 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate’s website (<https://national-infrastructure.consenting.planninginspectorate.gov.uk/projects/EN010149/documents>).
- 1.3.8 Once finalised, the SoCG will be submitted to the Examining Authority that is examining the Application under section 37 of the PA 2008 for an order granting development consent for the Proposed Development.
- 1.3.9 For the purposes of examination, this SoCG addresses the Relevant Representation Response received from the Environment Agency alongwith ongoing engagement. This SoCG includes the includes the following key topic areas:
- Flood risk;
 - Water framework directive;
 - Water quality;

¹ Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).



- Waste management; and
- Management plans and mitigation.

1.4. Terminology

1.4.1 This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in **Section 4** has been outlined below.

Cell	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going discussions between the parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2. The Proposed Development

2.1 Proposed Development Description

- 2.1.1 The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility with a total capacity exceeding 50 megawatts (MW), a Battery Energy Storage system (BESS) with an import and export connection to the National Grid Electricity Transmission.
- 2.1.2 The Proposed Development comprises the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the Local Authority. The detailed design of the Proposed Development will be undertaken within the parameters assessed in the Environmental Statement, which are secured through a range of control documents including the **Works Plans** [EN010149/APP/2.3] [APP-007], the **Design Commitments** [EN010149/APP/7.4] [APP-0138] and the requirements set out in the **draft Development Consent Order** [EN010149/APP/3.1] [REP1-006].
- 2.1.3 The location of the Proposed Development is shown in **ES Volume 2, Figure 1.1: Location Plan** [EN010149/APP/6.2] [APP-058] and described in **ES Volume 1, Chapter 2: Location of the Proposed Development** [EN010149/APP/6.1] [APP-042], with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered** [EN010149/APP/6.1] [APP-044].
- 2.1.4 The Proposed Development will be located within the ‘Order Limits’ (the land shown on the **Works Plans** [EN010149/APP/2.3] [APP-007] within which the Proposed Development can be constructed, operated and decommissioned). The extent of the Order Limits is shown on **ES Volume 2, Figure 1.2: Order Limits** [EN010149/APP/6.2] [APP-058]. The principal components of the Proposed Development include:
- Solar PV development including;
 - Ground-mounted Solar PV generating station. The generating station will include Solar PV modules and mounting structures;
 - Balance of Solar System (BoSS), which comprises inverters, transformers, and switchgear;
 - 400kV Grid Connection Corridor to connect the Springwell Substation and proposed National Grid Navenby Substation;
 - Satellite Collector Compounds comprising switchgear, transformers, ancillary equipment and operation, maintenance, security and welfare units;
 - A project substation (the ‘Springwell Substation’) compound, which will include substation, Main Collector Compound, switching and control equipment, office/control/welfare/security buildings, storage areas, and provisions for vehicular parking and material laydown;
 - BESS compound, including batteries and associated inverters, transformers, switchgear and ancillary equipment and their containers, enclosures, monitoring

systems, air conditioning, electrical cables, fire safety infrastructure and operation, maintenance, security and welfare facilities;

- Underground cabling will connect the Solar PV modules and BESS compound to the BoSS, Collector Compounds, and the Springwell Substation;
- Ancillary infrastructure works, including boundary treatments, security equipment, earthing devices, fencing, lighting, earthworks, surface water management, internal tracks and any other works identified as necessary to enable the Proposed Development;
- Landscaping, habitat management, biodiversity enhancement and amenity improvements; and
- Works to facilitate vehicular access to the Order Limits.

3. Record of Engagement

3.1 Summary of engagement

- 3.1.1 The Applicant has engaged with EA throughout the Development Consent Order application process, including during early stages of the design and environmental assessment of the Proposed Development. **Table 1** shows a summary of key engagement that has taken place between the Applicant and EA in relation to the Application.

Table 1 – Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
22 June 2023	Virtual meeting	- Discussion regarding flood risk and modelling. EA agreed that JFlow modelling would be suitable to use. - EA had no concerns on solar panels within Flood Zones 2 and 3 as long as raised above the flood level. The Applicant confirmed that no hard infrastructure, including inverter transformer stations would be located within the flood zones.
07 March 2024	Virtual meeting	Discussion about matters pertaining to flood risk and the Water Framework Directive (WFD) following their Section 42 comments in response to the Preliminary Environmental Information Report (PEIR).
30 April 2024	Virtual meeting	An ES Volume 3, Appendix 15.1: WFD Waterbodies Stage 1 Screening Technical Note [EN010149/APP/6.3] [APP-124] was presented to confirm there would be no impacts on the nearby Metheringham Beck WFD designated watercourse.
10 January 2025	Virtual meeting	- Provided an update on the Springwell Development Consent Order (DCO) Application and timeframes. - Presented and discussed the revised flood modelling that has been undertaken following S55 advice received from the Planning Inspectorate. The modelling outcomes validate the mitigation proposals and confirm that all panels in Flood Zone 2 and 3 would be located at a sufficient height above ground level, above the freeboard height to allow for flood risk. - EA agreed in principle that the modelling that has been undertaken, based on topographical data, is likely to be more detailed and accurate than the JFlow modelling provided by the EA. - EA agreed in principle with the approach that where Flood Zone 3 land is identified in the EA's flood zone

Date	Form of correspondence	Key topics discussed and key outcomes
		mapping but that was not in the more detailed modelling, this has been kept in as Flood Zone 3 on a precautionary basis. However, as the Applicant's more detailed model hasn't identified it as Flood Zone 3 it has been treated as Flood Zone 3a for the purpose of consideration under planning policy (EN-1 National Policy Statement (NPS)).
6 February 2025	Virtual meeting	Discussion about the revised surface water flood modelling released by the EA (released 28th January 2025) and confirmation that this does not affect the proposals for Springwell and the current mitigation in place remains suitable. Comments from the EA technical teams had not been received prior this call, therefore, a further call was set up for 12th February.
12 February 2025	Virtual Meeting	- EA received responses from their technical leads and their comments have been discussed that form the basis of their relevant representation. The key comments that were discussed are outlined below: Draft DCO [EN010149/APP/3.1] [REP1-006]: No objection to the approach of not including protective provisions in place for flooding within the Order Limits. - Flood Risk Assessment: Correction noted to Section 3.2.2 - main river should be referred to as Digby Beck. - Flood warning plans: Advice provided that flood events may occur without warning from the EA. - Flood Zones: Majority of the Order Limits sits within Flood Zone 1; parts of the area containing elevated solar panels lie within Flood Zones 2 and 3. No flood risk concerns raised. - Surface Water Mapping: New EA surface water maps published by the EA reviewed. No changes required to the assessment or mitigation strategy. - Surface Water Disposal: Further clarity required regarding discharge location from the main facilities building. If connection to mains is not feasible, alternative methods such as a package treatment plant or cesspit may require a permit. Request made to be added as a consultee for Requirement 10 (surface and foul water drainage). - Battery Energy Storage System: Supportive of being listed as a consultee under Requirement 7

Date	Form of correspondence	Key topics discussed and key outcomes
		(Battery Safety Management Plan). Additional detail requested regarding containment of firewater during emergency events. - Groundwater and Contaminated Land: No concerns raised regarding submitted information. Suggested inclusion of a watching brief within the Outline Construction Environmental Management Plan (oCEMP) [EN010149/APP/7.7.3] [REP2-015] for potential unexpected contamination during construction.
15 May 2025	Virtual Meeting	• Discussion on the Statement of Common Ground and items under discussion.
23 May 2025	Virtual Meeting	• Discussion on the Statement of Common Ground, items under discussion and document updates to be issued at Deadline 1.
3 July 2025	Virtual Meeting	• Discussion on the Statement of Common Ground and document updates that were issued at Deadline 1.
4 August 2025	Virtual Meeting	• Discussion on the remaining matters under discussion and document updates to be issued at Deadline 3.

4. Current Position

4.1.1 Position of the Applicant and the EA

- 1.4.2 The following table sets out the position of the parties, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.
- 1.4.3 As noted above, this is a 'live' document, and some aspects have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.

Table 2 – Position of the Applicant and the EA

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
Flood Risk				
2.1	Flood modelling	Applicant discussed the modelling to be used for the assessment. Due to the low risk of flooding, the EA agreed for the Applicant to use JFlow modelling for the Flood Risk Assessment. Following Section 55 advice received from the Planning Inspectorate, further detailed modelling was undertaken to differentiate between Flood Zone 3a and 3b within the Flood Risk Assessment.	Applicant proceeded with using the JFlow modelling for the purposes of the Flood Risk Assessment for the purposes of the DCO Application. Further modelling was undertaken following Section 55 advice received from the Planning Inspectorate and this can be located within the Flood Risk Assessment [EN010149/APP/7.16.3] [REP1-050].	Agreed
2.2	Solar in Flood Zone 2 and 3	The EA does not object to the proposed placement of solar panels within small areas of Flood Zone 2 and 3 in Springwell East because this is a business risk for the developer. The EA is satisfied that the panels are to be raised above the flood level, including appropriated freeboard to mitigate the residual effect.	This is welcomed and agreed.	Agreed

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
		The EA is also satisfied with the proposal for all other associated infrastructure including the Inverter Transformer Stations, BESS and Springwell Substation to be located outside of Flood Zone 2 and 3.		
2.3	Consideration of Flood Zone 3b	The Environment Agency is satisfied with the proposed approach of where there is Flood Zone 3 identified in the EA Mapping and not in the Applicant's detailed modelling, that this will be kept in as Flood Zone 3 on a precautionary basis and treated as Flood Zone 3a, for the purpose of consideration under planning policy (EN-1 NPS). The EA are satisfied with the flood risk mitigation measures identified and have no additional comments at this time. Environment Agency are pleased that the revised Flood Risk Assessment takes account of new National Flood Risk Assessment (NaFRA2) data and assesses its implications for the proposed project.	Additional flood modelling has been undertaken following S55 advice received from the Planning Inspectorate and forms part of the Flood Risk Assessment [EN010149/APP/7.16.3] [REP1-050]. The EA released further fluvial modelling datasets on the 25th March 2025 and this has been reflected in the updated document submitted at Deadline 1. There are no significant variations in the mapped outputs from the previous mapping or the additional hydraulic modelling undertaken by the Applicant. The previous mitigation measures agreed with the EA still apply.	Agreed

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
2.4	ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1] [APP-043]	Paragraph 3.4.22 from ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1] [APP-043] states that 'To ensure climate resilience, all options would be located within fields suitable for the Solar PV modules and outside Flood Zones 2 and 3'. This statement is incorrect because Solar PV modules are proposed to be located in Flood Zones 2 and 3. The Environment Agency welcome the update to paragraph 3.2.44.	The NaFRA2 mapping does not provide data on flood depths in these areas". The Environment Agency are satisfied that the flood depth data reflects the hydraulic modelling findings of the FRA and that flood depths do not exceed 0.45m during the 100 year flood event. The Applicant has updated paragraph 3.4.22 as part of the updated documentation submitted at Deadline 1 to state that Solar PV modules are proposed within a small area of Flood Zones 2 and 3 for clarity.	Agreed
2.5	Part 2, Principal Powers, Article 6 & Protective Provisions (Schedule 15)	The Applicant has requested the disapplication of the consent required in relation to the carrying out of a relevant flood risk activity under the Environmental Permitting (England and	The Applicant has considered the response from the EA and agrees that Article 6 can be amended so that (f) is deleted.	Agreed

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
		Wales) Regulations 2016. From the information submitted with the application the EA are satisfied that no activities will take place that would require the need for a flood risk activity permit under the Environmental Permitting (England and Wales) Regulations 2016. Accordingly, the EA does not consent to this disapplication as required by section 150 of the Planning Act 2008, as there is no need for this legislation to be disappplied. This is also relevant for the legislation contained in part (d). Therefore, the EA request that parts (d) and (f) are deleted from Article 6. Environment Agency welcomes the deletion of Article 6 part (f) and part (d) to be submitted at Deadline 3.	The Applicant understands the point made in relation to (d) pursuant to which, the EA as the appropriate agency can make byelaws in relation to flood defences, drainage and fisheries. The Applicant requests the EA to expand upon the reasoning for the suggested removal of (d) so that it can further consider the request. Following EA confirmation that they do not feel that there is a need for the disapplication as the project does not raise any matters that are likely to be impacted by this legislation, the Application has considered this and amended Article 6 at Deadline 3 so that (d) is deleted.	
Water Framework Directive				
2.6	WFD Assessment	The Applicant prepared a technical note setting out why a WFD Assessment was not required for the Proposed Development, on the basis that there are	The Applicant confirmed there would be no significant effects on the nearby Metheringham Beck	Agreed



Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
		no water bodies within or adjacent to the Site that would be affected by the works. The EA reviewed the technical note and confirmed agreement with its conclusions.	WFD designated watercourse and therefore a WFD assessment is not required.	

Water Quality and Waste Management

2.7	Foul Water Disposal	The EA advised that the potential impact of foul water discharge from the proposed facilities at the BESS on surface water must be considered in more detail. Connection to a public foul sewer is the preferred option, and the Applicant must demonstrate that this is not feasible before alternative solutions such as a package treatment plant can be considered. Any such solution must comply with the General Binding Rules or require an environmental permit. The use of a cesspool is only acceptable if fully justified as a last resort. Environment Agency welcomes the inclusion of the EA as a specific consultee to the discharge of	The connection to a public sewer is considered not to be feasible due to the distance of approximately 3km from the nearest public foul sewer (Main Street, Ashby de la Launde) to the welfare facilities that will be located in Field Tb2 in the north of Springwell West (ES Volume 2, Figures Chapter 1: Background and Context (Figure 1.2) [EN010149/APP/6.1] [APP-041]). The distance of the connection would be unviable due to the environmental impacts, disruption that it would cause to local communities and the road network and associated costs. During the operational phase, it is anticipated that up to 24 permanent staff per day would typically be onsite during the operation (including routine maintenance) phase, therefore based on the above practicalities and minor level of foul waste that will be produced by the Proposed Development, a connection to the public sewer is not considered feasible.	Agreed
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Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
		Requirement 10 (Drainage) for the foul water drainage strategy	The Applicant notes that should a package sewage treatment plant be required that it must comply with the General Binding Rules for small sewage discharges or an environmental permit will need to be obtained; this will be taken into account post-consent during the detailed design and approved by the relevant planning authority as secured by Requirement 10 of the Draft Development Consent Order [EN010149/APP/3.1.2] [REP1-006]. Mitigation to prevent pollution of the water environment is outlined and secured within the oOEMP [EN010149/APP/7.10.2] [REP2-018]. Further information on surface water drainage and foul water drainage can be found in Flood Risk Assessment – Appendix A Outline Drainage Strategy [EN010149/APP/7.16.3] [REP1-050] respectively.	
2.8	Requirement 10 (Surface and foul water drainage)	The EA have requested to be consulted on the drainage strategy as the method of foul water disposal is unknown and the method of surface water disposal from the BESS are yet to be finalised. Environment Agency welcomes the inclusion of the EA as a specific consultee to the discharge of	With respect to being a consultee in relation to water disposal from the BESS, this would be captured as part of the Battery Safety Management Plan and the EA is already a consultee pursuant to Requirement 7 in relation to this plan. With respect to Requirement 10 the Applicant agrees to add the EA as a consultee in relation to foul water drainage.	Agreed

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
		Requirement 10 (Drainage) for the foul water drainage strategy		
Management plans and mitigation				
2.9	Ground contamination	The EA have also requested the inclusion of an additional Requirement in the DCO to secure a procedure for managing unexpected contamination encountered during construction, including the submission and approval of a remediation strategy and verification report. This remains the EA's final position on this matter and the drafting of the requested Requirement is contained in paragraph 3.5 of its Relevant Representation [RR-130]. The EA advises that, if contamination is identified, developers should follow established guidance for managing land contamination, including the Land Contamination: Risk Management framework and the EA Guiding Principles for Land Contamination.	With respect to the additional requirement requested, the Applicant considers this is more appropriately included in the oCEMP [EN010149/APP/7.7.3] [REP2-015] and this has been added in the updated document submitted at Deadline 1 and updated at Deadline 3 to amend the commitment to 'no further development in the area where contamination was located shall be carried out' to avoid works halting across the entire Site. In order to assess the potential for land contamination, a Preliminary Risk Assessment was undertaken during 2022 in accordance with Land Contamination Risk Management guidance. The assessment comprised a desk-based review of information published online, the purchase of an environmental database report, and a site reconnaissance survey. This survey confirmed that there are no known identified sources of contamination on the Site. The Preliminary Risk	Not Agreed

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
		Developers are also encouraged to use the National Quality Mark Scheme for Land Contamination Management, and consult relevant guidance on groundwater protection and dewatering, particularly where an environmental permit may be required. Environment Agency welcome the addition of wording to Table 8 (Land, Soil and groundwater) on the 'Discovery of Unsuspected Contamination' and the procedure to follow if unexpected contamination is encountered during development, although they are not satisfied that this is the appropriate place for this control mechanism. The wording included is more akin to a Development Consent Order requirement in itself. Also, the wording included would effectively halt all the development works, i.e., "no further development shall be carried out", which is more onerous than that suggested by the EA, which only	Assessment can be located in ES Volume 3, Appendix 11.2: Preliminary Risk Assessment [EN010149/APP/6.3] [APP-082]. Potential contamination during construction, operation and decommissioning activities will be controlled by the implementation of mitigation measures which are specified in the oCEMP [EN010149/APP/7.7.2] [REP2-015], Outline Operational Environmental Management Plan (oOEMP) [EN010149/APP/7.10.2] [REP2-018] and Outline Decommissioning Environmental Management Plan (oDEMP) [EN010149/APP/7.13.2] [REP2-021]. Should any contamination be identified throughout the construction, operation and decommissioning activities the investigation and assessment will be completed in accordance with the EA Guiding Principles for Land Contamination. Should remediation of identified contamination be required, a remediation strategy will be developed and agreed in writing with the local authority and EA.	

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
		required work in the location where contamination was discovered to cease.		
2.10	Mitigation measures	The EA are satisfied that with the implementation of mitigation measures outlined in the relevant management plans, including the prevention of leaks or spills and the use of best practice methods during construction, the risk to groundwater is low.	This has been welcomed and agreed.	Agreed
2.11	Schedule 2 Requirements	We welcome the Applicant's inclusion as a specific consultee to the discharge of Requirements: • 7 (Battery safety management); • 12 (Construction environmental management plan); • 13 (Operational environmental management plan) and; • 19 Decommissioning and restoration).	The Draft DCO [EN010149/APP/3.1.2] [REP1-006] submitted with the Applicant's DCO Application includes the EA as a consultee for each of these requirements. At Deadline 1, the Applicant amended the Draft DCO [EN010149/APP/3.1.2] [REP1-006] to include the EA as a consultee on Requirement 10 as detailed and agreed in matter 2.8 of the Statement of Common Ground. All matters have been agreed in relation to the Schedule 2 Requirements, apart from the remaining matter detailed in Section 2.9 (Ground Contamination) of this table.	Agreed

Ref.	Description of Matter	Statutory Interested Party Comment	Applicant's Response	Status
2.12	Schedule 16 (Article 46) - Procedure for discharge of Requirements	EA request that part 6(a) (Further information and consultation) is amended to allow required consultees 15 days of receipt of the application to notify the relevant planning authority in writing specifying any further information it considers necessary in order to comment on the application.	The Applicant has amended the draft DCO [EN010149/APP/3.1.3] [REP1-006] at Deadline 3 to allow required consultees 15 days of receipt of the application to notify the planning authority in writing.	Agreed
2.13	Emergency Preparedness and Response Plan	EA have requested to include reference to the preparation of an Emergency Preparedness and Response Plan to be developed in consultation with the EA to detail the procedures for responding to incidents (such as spills, leaks or generation of silt laden runoff to prevent pollution on site, and reporting within the oCEMP [EN010149/APP/7.7] [APP-0140] and oOEMP [EN010149/APP/7.10] [APP-0143] .	Paragraph 2.11.1 within the oCEMP [EN010149/APP/7.7.2] [REP2-015] and paragraph 2.11.2 of the oOEMP [EN010149/APP/7.10.2] has been updated in the updated documented submitted at Deadline 1 to include reference to the plan to be developed in consultation with the EA in relation to pollution prevention. The description of the procedures that the plan will include are outlined within paragraph 2.11.2 within the oCEMP [EN010149/APP/7.7.2] [REP2-015] and oOEMP [EN010149/APP/7.10.2] [REP2-018] .	Agreed

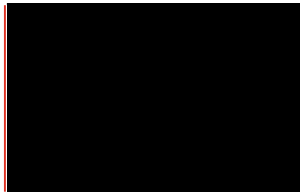
5. Signatures

This Statement of Common Ground is agreed upon:

On behalf of Environment Agency

Name: 

Signature:



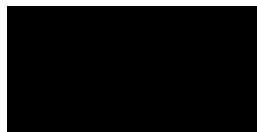
Date: 11 August 2025

On behalf of the Applicant

Name:

Rory Carmichael

Signature:



Date:

12 August 2025