



Dean Moor Solar Farm

Environment Agency Draft Statement of Common Ground ~~with~~ ~~Environment Agency~~

on behalf of **FVS Dean Moor Limited**

~~26 August~~30 September 2025

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DEAN MOOR SOLAR FARM
DRAFT STATEMENT OF COMMON GROUND WITH ENVIRONMENT
AGENCY
PLANNING INSPECTORATE REFERENCE EN010155
PREPARED ON BEHALF OF FVS DEAN MOOR LIMITED

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1 Introduction

1.1 Status of the Statement of Common Ground

1.1.1 This draft Statement of Common Ground ('dSoCG') has been produced for FVS Dean Moor Limited ('the Applicant') to support the application for a prepared in respect of the Development Consent Order (the 'DCO application') to the Secretary of State for Energy Security and Net Zero ('SoS') for Dean Moor Solar Farm ('the Proposed Development') located between the villages of Gilgarran and Branthwaite in West Cumbria (the 'Site'), which is situated within the administrative area of Cumberland Council ('the Council').

1.1.2 This dSoCG has been prepared by (1) the Applicant and (2) the Environment Agency (EA). It is agreed that this dSoCG is an accurate description of the matters raised by the EA and the current status of each matter. A high-level overview of the engagement undertaken since September 2023 is summarised in section 3.

1.2 Purpose of this document

1.2.1 The dSoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached. In the planning process, SoCGs are an established means of allowing all parties to identify and focus on specific matters that may need to be addressed during the Examination. The dSoCG is a 'live' document that will be updated by the parties as matters progress.

1.3 Terminology

1.3.1 In the matters tables in Section 2 of this SoCG, '*Matter agreed*' indicates where issues are resolved. '*Matter under discussion*' indicates where points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties and '*Matter not agreed*' indicates agreement on the matter could not be reached following significant engagement.

2 Current Position

2.1 Position of the Applicant and the Environment Agency

2.1.1 The Applicant and the EA have had positive engagement on a number of matters, which are set out in Table 2.1 and 2.2 below.

2.1.2 As requested by the EA, the Applicant has undertaken further hydraulic analysis, which was submitted to the EA on the 14.08.2025, which the EA ~~is currently reviewing~~has reviewed and confirmed agreement with (EA10, EA11, EA12). ~~A number of the matters listed within Table 2.2 as ‘under discussion’ may be progressed once the EA has reviewed the hydraulic analysis, and is satisfied that it confirms the conclusions within the FRA and ODS.~~

2.1.3 This ~~dSoCG~~dSoCG reflects the outcomes of further engagement between the Applicant and the EA on the ‘matters under discussion’ submitted within Table 2.2 of Version 1 of this dSoCG [REP2-014]. The EA and the Applicant met on the 23 September 2025 to discuss the amendments recommended by the EA to the Outline Construction Environmental Management Plan (OCEMP) [APP-108] and Flood Risk Assessment (FRA) and Outline Drainage Strategy (ODS) [REP2-022] which would provide a resolution to the remaining ‘matters under discussion’. The ~~approach to addressing these matters is agreed in principle, which is approach to addressing the EA’s concerns are~~reflected in Table 2.2, subject to the EA’s review of these updated documents, which the Applicant is intending to consult the EA on in advance of submission at Deadline 4.~~e Applicant has provided detailed responses to the matters raised by the EA within their RR [RR-017] ‘Applicant Response to Relevant Representations’ (ARRR) [REP1-002]. This dSoCG reflects ongoing discussions with the EA, and broadly covers the points raised within the EA’s RR and will be updated as necessary to reflect the EA’s response to the ARRR.~~

2.1.4 The shared position set out below in Table 2.1 ‘Matters agreed’ is considered to be agreed. However, the wording may be refined following

further engagement between the parties and these updates will be presented in the next version of this dSoCG.

2.2 Matters agreed

2.2.1 Table 2.1 below details the matters agreed with the EA.

Table 2.1 Matters agreed

Ref	Topic	Shared position	Application Ref
EA1	Approach to flood risk from sewers	There is no risk of flooding from sewers and no risk to sewage undertaker assets associated with the Proposed Development. Land searches provided in FRA Appendix C show that there is a United Utilities West (Uuw) clean water sewer which runs along the eastern boundary within the Site, but this is within the public highway and outside of where any new uses or intrusive works would be undertaken. As Uuw have confirmed they have no assets in any of the Site which could be affected by works and they have no records of sewer flooding in the vicinity of the site, it is agreed that the potential for sewer flooding impacts and associated risks has been adequately addressed.	ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy FRA & ODS [REP2-022AS-013] (section 5) Appx C - Stakeholder Correspondence of ES Appx 2.4 FRA and ODS [APP-101]
EA2	Use of buffer strips to protect Ordinary Watercourses within the Site.	<p>The Proposed Development includes minimum 8m exclusion areas from the top of the bank of watercourses/waterbodies in accordance with EA and LLFA recommendations, along with additional Site management mechanisms to protect watercourses. The parameters secured by the Works Plans, in conjunction with management plans such as the Outline Construction Environmental Management Plan (OCEMP), and requirements associated with the Lead Local Flood Authority (LLFA) secondary consenting procedures will ensure effective protection of the water environment.</p> <p>The exception to the 8m buffer is limited to the locations of existing crossing points (e.g. culverts) which may be utilised as part of the final design. As set out in the OCEMP, works within 8m of the watercourse would only be undertaken in accordance with a method statement and design approved by the LLFA. It is agreed that restricting all development within 8m of a watercourse other than development which approved via the LLFA's procedure under the S23 of the Land Drainage Act 1991 is an appropriate means by which to control development with the potential to effect ordinary watercourses across the Site.</p>	ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy FRA & ODS [REP2-022AS-013] Works Plans [APP-007] ES Fig 3.5 Exclusion Areas [APP-050] Consents & License Position Statement [APP-025] ES Appx 5.1 Outline Construction Environmental Management Plan OCEMP

Ref	Topic	Shared position	Application Ref
		(See EA8 for independent discussion of this issue). The EA will be consulted on the final Drainage Strategy.	[APP-108] Draft DCO [REP2-004]
EA3	Approach to flood risk management and monitoring	<p>Monitoring of flood risk conditions and ground conditions associated with weather events that may affect the timing or methods of working on Site are embedded in control documents governing each phase of the Proposed Development's operational life.</p> <p>These are principally contained within the OCEMP, Outline Operational Management Plan (OOMP), and Framework Decommissioning Management Plan (FDMP), although supporting measures will also be provided via the ODS, Outline Soil Management Plan (OSMP), and Outline Landscape Ecological Management Plan (OLEMP). The Outline Operational Management Plan (OOMP) also includes a commitment to facilitate LLFA and EA's watercourse monitoring obligations.</p> <p>It is agreed that in-principle that the management plans are a suitable way to provide the means by which to monitor and manage flood risk conditions on the Site subject to the EA's review of the final versions provided to discharge the associated DCO Requirements.</p>	<p>ES Appx 5.1 Outline Construction Environmental Management Plan OCEMP [APP-108]</p> <p>ES Appx 3.1 Outline Operational Management Plan OOMP [APP-107]</p> <p>ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy FRA & ODS [REP2-022AS-013]</p> <p>ES Appx 7.7 Outline Landscape Ecological Management Plan OLEMP [APP-145]</p> <p>ES Appx 5.4 Framework Decommissioning Management Plan FDMP [APP-111]</p>
EA4	Approach to minimising impacts from watercourse crossings.	<p>All watercourses on the Site are ordinary watercourses. An EA Main River is present outside of but adjacent to the eastern boundary of Area C. No works are proposed in the vicinity of this watercourse that would necessitate a Flood Risk Activity Permit from the EA.</p> <p>As per EA5, there will be a standard buffer of at least 8m for all watercourses. The exception to this are the limited locations where watercourse crossings are required. No new culvert locations are expected to be required for internal access, as the Site has numerous established existing crossings associated with the agricultural use. The</p>	<p>Works Plans [APP-007]</p> <p>ES Appx 5.1 Outline Construction Environmental Management Plan OCEMP [APP-108]</p> <p>Consents & License Position Statement [APP-</p>

Ref	Topic	Shared position	Application Ref
		<p>Proposed Development will seek to retain and reuse existing crossings of ordinary watercourses. Where necessary, any new crossing works for internal access would involve upgrades or replacements of existing culverts and can be suitably designed so they do not impede the ordinary watercourses across the Site. i.e., no lesser cross-sectional area than the existing channel.</p> <p>Potential impacts on watercourses are minimised by the Works Plans which limit crossings to only the locations of existing crossings. Whilst works may occur at these locations to replace or reinforce existing crossings, this will occur in accordance with plans and method statements approved by the LLFA via their 'Ordinary Watercourse Consent' (OWC) procedures under S23 of the Land Drainage Act 1991.</p>	025
EA5	Enhancements of watercourse and wetland habitats on Site	<p>Along with the Work Plans which reinforce the minimum 8m buffer the Applicant has proposed a green infrastructure strategy which will benefit watercourses, as illustrated by the Landscape Strategy Plan (LSP). Whilst in-stream enhancements are not proposed at this time, they may be considered as part of the final design. Measures that will directly and indirectly benefit watercourses as habitats and water quality include grassland ground cover and new and improved boundary vegetation which will reduce runoff and provide water quality treatment before surface water enters watercourses. Scrub and riparian planting along watercourses will provide habitat connection and enhancements to water quality and watercourses as habitats. An outline of the management regime for these enhancements is set out within the OLEMP.</p> <p>It is agreed that positive effects can be delivered for watercourses as habitats and on water quality, due to the 8m buffer being applied, new and improved green infrastructure, the reduction of intensive grazing, annual monitoring of planting and BNG achievement, and ongoing management.</p> <p>It is agreed that the LEMP (which will be in accordance with the OLEMP and its OGMP), which will operate across the lifetime of the Proposed Development and be subject to regular updates informed by monitoring, is an appropriate mechanism by which to secure the management planting and grazing on-Site. While this is subject to a review of the content of the final LEMP, and BNG outcomes to be delivered to be provided as a DCO</p>	<p>ES Appx 2.3 Water Framework DirectiveWFD Assessment [APP-098]</p> <p>ES Appx 7.7 Outline Landscape Ecological Management PlanOLEMP [APP-145]</p> <p>ES Appx 7.7 Outline Landscape Ecological Management Plan [APP-145] (see Appendix A to the OLEMP - Outline Grazing Management Plan)</p> <p>ES Fig 7.6 Landscape Strategy PlanLSP [REP2-046APP-088]</p> <p>ES Ch8 Biodiversity [REP2-053APP-038]</p>

Ref	Topic	Shared position	Application Ref
		<p>Requirement, there is in-principle agreement that the approach proposed is sensitive to the potential impacts on water quality, to the need to prevent overgrazing, and the need to protect and enhance the buffer strips adjacent to watercourses.</p> <p>It is agreed that instream enhancements to watercourses would be impractical due to the size of the watercourses on Site.</p>	<p>ES Appx 8.8 BNG Report [APP-157]</p> <p>ES Appx 5.4 Framework Decommissioning PlanFDMP [APP-111]</p> <p>Pre-Application Land and Rights Negotiations Tracker [REP2-009APP-017]</p>
EA6	Approach to the Water Framework Directive (WFD) Assessment	<p>The Applicant has submitted a Water Framework Directive (WFD) Assessment (WFDA) which details the potential impacts the Proposed Development could have on watercourses' ability to meet the WFD requirements. It is agreed that the methodology of the WFDA has followed the EA's recommended methodology for WFD assessment in accordance with the EA's 2015 guidance, '<i>Protecting and improving the water environment - Water Framework Directive compliance of physical works in rivers</i>'.</p>	<p>ES Appx 2.3 Water Framework DirectiveFD Assessment [APP-098]</p> <p>ES Ch2 EIA Methodology [APP-033]</p> <p>ES Appx 2.4 Flood Risk Assessment and Outline Drainage StrategyFRA & ODS [REP2-022AS-013]</p>
EA7	Protection of peat resources within the Site	<p>The Applicant and the EA are aligned that peat is an important resource that must be protected. Areas of peat are identified in a Peat Survey Report (ES Appendix 10.3) and are excluded through the Works Plans and/or otherwise protected in management plans for each phase of the Proposed Development.</p> <p>Peat will not be extracted or handled and no structures (e.g. buildings or solar arrays) or intrusive works such as cabling are proposed in areas of peat, including a minimum 10m buffer around identified areas of peat, to avoid potential impacts. Where Site activities have potential to effect peat resources they will only occur if they can be managed to avoid adverse impacts and this is secured through outline management plans for each phase of the Proposed Development.</p> <p>Should any areas of peat be discovered or suspected in the course of construction, further</p>	<p>ES Appx 10.3 Peat Survey Report [APP-173]</p> <p>Works Plans [APP-007]</p> <p>ES Fig 3.5 Exclusion Areas [APP-050]</p> <p>ES Appx 5.1 Outline Construction Environmental Management PlanOCEMP [APP-108]</p> <p>ES Appx 5.3 Outline Soil</p>

Ref	Topic	Shared position	Application Ref
		preventative measures may be required. This approach is set out within section 5.5 and 11.3 of the OCEMP. The OSMP also outlines measures to ensure that peaty/organic soils are handled to maintain peatland ecosystem services and that construction machinery is not trafficked over soils where a peaty layer is present. If operational maintenance works are required in peat exclusion areas where controls were required by the CEMP, measures from the CEMP will be carried forward and applied to that part of the Site. Any measures required would also be taken forward into the decommissioning phase through the Decommissioning Management Plan, which would avoid impacts on identified peat.	Management Plan OSMP [APP-110] ES Appx 5.4 Framework Decommissioning Management Plan FDMP [APP-111]
EA8	Environmental permits	It is agreed that the approach to environmental permits and consents set out within the Consents and Agreements Position Statement accurately identifies potential consents that could be required and reflects in accordance with the Applicant's engagement with the EA on this matter.	Consents and Agreements Position Statement [APP-025] ES Appx 5.1 Outline Construction Environmental Management Plan OCEMP [APP-108] (section 5) ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy FRA & ODS [REP2-022AS-013]
EA9	Foundation Works Risk Assessment	As requested by the EA, if / where contamination is identified following ground investigation, a Foundations Works Risk Assessment will be prepared. The OCEMP, provides the mechanism by which the need to undertake FWRA is secured, stating ' <i>following ground investigation and subsequent assessment, if/where contamination is identified a Foundation Works Risk Assessment ('FWRA') will be prepared... to ensure that the proposed foundation method will not have an adverse impact by creating new pathways for the migration of contamination</i> '. DCO Requirement 4 provides the mechanism by which the OCEMP, and all the requirements within it, including the need to undertake FWRA, is	ES Ch10 Ground Conditions [APP-041] ES Appx 5.1 Outline Construction Environmental Management Plan OCEMP [APP-108]

Ref	Topic	Shared position	Application Ref
		secured.	
EA10	Assessment of flood risk from watercourses within the Site, including the impact of climate change, and the application of the EA's updated National Flood Risk Assessment (NaFRA) mapping.	<p>The Site is overall at low risk of flooding from all sources, as set out in the FRA (see Section 5.10).</p> <p>The Applicant has undertaken further hydraulic analysis which confirms the conclusions within the FRA and ODS, and the risks which are identified in the RoFSW mapping.</p> <p>It is agreed that the hydraulic analysis presented within ES Appendix 2.4 FRA & ODS Appendix D Hydraulic Modelling is reasonable and follows the approach that was discussed in the meeting between the Applicant and the EA on the 17 July 2025.</p>	<p>ES Appx 2.4 FRA & ODS [REP2-022] (section 5)</p> <p>ES Appx 2.4 FRA & ODS Strategy Appendix D – Hydraulic Modelling [REP2-024]</p>
EA11	The need for modelling of flood risk from the ordinary watercourses which join Lostrigg Beck main river	<p>The Applicant has discussed the available baseline flood risk data with the LLFA, who are in agreement that the Site is generally at low risk of flooding and that the EA RoFSW maps, which include allowances for climate change, are sufficient to inform the assessment of flood risk for the Site given the nature of the Proposed Development as 'essential infrastructure' that is not associated with flood risk vulnerability or with potential to increase flood risk elsewhere.</p> <p>There are no main rivers within the Site, with the nearest being the Lostrigg Beck to the east of the Site opposite the public highway (Branthwaite Edge Road) that forms the Site's eastern boundary.</p> <p>This position was prior to the release of the updatedThe EA RoFSW mapping was updated in January/March 2025, which with the EA's advice that these offer have advised are a 'significant improvement' to the previous mapping, using additional data and providing finer spatial resolution. In accordance with the feedback from the LLFA, the Applicant's has maintained its position is therefore that additional modelling of flood risk withinformed by the updated the RoFSW mapping was not necessaryis not necessary, as the Site is outside of the fluvial flood risk area from the Lostrigg Beck in present day and future climate change scenarios. As described in EA16, the Applicant's understanding of the position has not</p>	<p>ES Appx 2.4 FRA & ODS [REP2-022]</p> <p>ES Appx 2.4 FRA & ODS Appendix D – Hydraulic Modelling [REP2-024]</p> <p>ES Appx 2.3 WFD Assessment [APP-098]</p>

Ref	Topic	Shared position	Application Ref
		<p><u>changed following the receipt of the updated mapping in March 2025.</u></p> <p><u>There are no main rivers within the Site, with the nearest being the Lostrigg Beck to the east of the Site opposite the public highway (Branthwaite Edge Road) that forms the Site's eastern boundary.</u></p> <p><u>The EA requested further analysis (not modelling), based on the RoSW mapping, and The Applicant and the EA agreed the scope for further hydraulic analysis. This analysis has generated rating curves and detailed flood extents based on EA-advised precautionary flood flows and utilising the most precautionary 2080s epoch flows (on the basis that delays could push the operational and decommissioning phase into the start of this epoch).</u></p> <p><u>The results of this analysis are consistent with the EA Risk of Flooding from Surface Water (RoSW) mapping which are also utilised to assess fluvial flood risk within the FRA and ODS. The hydraulic analysis has confirmed the RoSW maps are a robust proxy for the fluvial flood risk where the ordinary watercourses converge over the central part of the Site. It is agreed that the hydraulic analysis presented by the Applicant is reasonable.</u></p>	
<u>EA12</u>	<u>Approach to the Pluvial (surface water) flood risk</u>	<p><u>The Site is generally at low risk of surface water flooding other than along watercourses and in natural topographic depressions. The Proposed Development is of a nature that is not vulnerable to flood risk and will not increase flood risk elsewhere following the implementation of the targeted sustainable drainage strategy as set out in the FRA and ODS. The principles of the ODS are agreed with the LLFA and Natural England, and it is not considered that additional pluvial flood risk modelling will be necessary because this topic can be addressed through good design.</u></p> <p><u>It is agreed that the hydraulic analysis presented within Appendix D of the FRA & ODS is considered reasonable. Further pluvial flood risk modelling and hydraulic modelling is not considered necessary.</u></p>	<p><u>ES Appx 2.4 FRA & ODS [REP2-022] (section 5 and section 8 (ODS))</u></p> <p><u>ES Appx 2.4 FRA & ODS Appendix D – Hydraulic Modelling [REP2-024]</u></p>
<u>EA13</u>	<u>Management of contamination and pollution during construction.</u>	<p><u>It is agreed that the OCEMP and OSMF provide the basis of a comprehensive set of construction management measures that directly relate to water quality effects, including general housekeeping (how/where things are sited), pollution prevention (including dirt/dust and contamination incidents), waste management, the use of barriers such as silt fencing.</u></p>	<p><u>ES Appx 5.1 OCEMP [APP-108]</u></p> <p><u>ES Appx 7.7 OLEMP [APP-145]</u></p>

Ref	Topic	Shared position	Application Ref
	<u>operation, and decommissioning</u>	<p><u>and other measures which have knock-ons for water quality such as the restriction of works depending on soil wetness conditions.</u></p> <p><u>It is agreed that, during operation, the Proposed Development will only have a minimal risk of pollution, and proposed natural drainage and swales, vegetated buffer strips and marginal planting, and management of limited conservation grazing has the potential to improve water quality at the River Marron and benefit riparian plant species, birds, and aquatic species including European eel and brown trout. Habitats and planting on Site will be managed in accordance with a LEMP which will include surveys and monitoring and ensuring that non-native species do not become established. The GMP further has the objective of preventing overgrazing and agricultural runoff into watercourses.</u></p> <p><u>It is agreed that, during decommissioning, the FDMP provides a suitable framework to secure the appropriate pollution and contamination prevention measures, which will be set out within a Decommissioning Environmental Management Plan (DEMP) in line with the principles established by the OCEMP and best practice at the time of decommissioning.</u></p>	<p><u>ES Appx 3.1 OOMP [APP-107]</u></p> <p><u>ES Appx 5.3 OSMP [APP-110]</u></p> <p><u>ES Appx 5.4 FDMP [APP-111]</u></p>
<u>EA14</u>	<u>WFD Assessment of water quality impacts.</u>	<p><u>The WFD Assessment concludes that the Proposed Development will not have any significant effects on the WFD water bodies and will not prevent future improvement to either the Lostrigg Beck and Lowca Beck WFD waterbodies. It further concludes that a positive impact on waterbodies is possible from reduced contamination from polluted surface runoff due to the reduced grazing, the use of SuDS, and the planting within Lostrigg Beck.</u></p> <p><u>The appropriate mitigation of water quality impacts (i.e. from materials management measures, pollution and contamination prevention, grazing management, and maintenance and monitoring of watercourses and habitat enhancements) are provided within the relevant outline control documents for the construction, operational, and decommissioning phases, as well as from the embedded measures such as watercourse buffers secured through the Works Plans, and infrastructure parameters, secured through the Design Parameters Document (DPD).</u></p> <p><u>The Applicant has noted the EA's recommendations for further measures to be included within the final CEMP in relation to the storage of fuel and oil, and wheel washing facilities.</u></p>	<p><u>ES Appx 2.3 WFD Assessment [APP-098]</u></p> <p><u>Works Plans [APP-007]</u></p> <p><u>DPD [APP-028]</u></p> <p><u>ES Appx 2.4 FRA & ODS [REP2-022]</u></p>

Ref	Topic	Shared position	Application Ref
		<u>The Applicant welcomes the EA's recommendations on these matters and has noted them for the production in the final CEMP, for which the EA is named as a consultee within the dDCO.</u>	
<u>EA15</u>	<u>The potential need for further engagement relating to temporary possession.</u>	<p><u>The EA retains an interest in the following plots (described in the Book of Reference, which the EA has confirmed), which are subject to temporary possession. These highway plots are required for street works. It is understood that the EA may retain some interest in the land as a result of Lostrigg Beck running beneath the highway. No works are proposed to Lostrigg Beck.</u></p> <p><u>The Applicant will engage further with the EA if the EA has any concerns and will notify the EA if there are any changes to the plans that involve works to the Lostrigg Beck.</u></p> <p><u>Plots: 1-65,4-01.</u></p>	<u>Book of Reference [APP-016]</u>

2.3 Matters under discussion

2.3.1 Table 2.2 below details the matters under discussion with the EA.

Table 2.2 Matters under discussion

Ref	Topic	Applicant Position	EA Position	Application Ref
EA10	Assessment of flood risk from watercourses within the Site, including the impact of climate change, and the application of the EA's updated National Flood Risk Assessment (NaFRA) mapping.	<p>The Site is overall at low risk of flooding from all sources, as set out in the FRA (see Section 5.10).</p> <p>The updates to the NaFRA made in January 2025, including improved national scale mapping datasets for the 'Risk of Flooding from Surface Water' (RoFfSW) mapping and 'Long Term Flood Risk from Rivers and Sea' mapping have been referenced within the Flood Risk Assessment and Outline Drainage Strategy. The mapping also included both present day and a future scenarios for surface water (covering a projection to the 2040–2060 epoch).</p> <p>The Applicant has undertaken further hydraulic analysis which confirms the conclusions within the FRA and ODS, and the risks which are identified in the RoFfSW mapping. This will be captured within an updated FRA and ODS to be submitted at Deadline 2.</p>	<p>The Applicant has undertaken further hydraulic analysis. They submitted a Hydraulic Analysis on 14-08-2025 which the Environment Agency (EA) is currently reviewing. If satisfactory it will be incorporated into the FRA.</p> <p>The matter stands as under discussion until the EA has finished reviewing and is satisfied that the analysis confirms the conclusions within the FRA and ODS, and the risks which are identified in the RoFfSW mapping.</p>	ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy [AS-013] (section 5)
EA11	The need for modelling of flood risk from the ordinary watercourses which join Lostrigg Beck main river	<p>The Applicant has discussed the available baseline flood risk data with the LLFA, who are in agreement that the Site is generally at low risk of flooding and that the EA RoFfSW maps, which include allowances for climate change, are sufficient to inform the assessment of flood risk for the Site given the nature of the Proposed Development as 'essential infrastructure' that is not associated with flood risk</p>	<p>The EA initially requested further assessment to provide confirmation that the ordinary watercourses flowing through the Site are not a significant source of flood risk when climate change is taken into</p>	ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy [AS-013] ES Appx 2.3 Water Framework Directive Assessment [APP-

Ref	Topic	Applicant Position	EA Position	Application Ref
		<p>vulnerability or with potential to increase flood risk elsewhere. This position was prior to the release of the updated mapping in January/March 2025, which the EA have advised are a 'significant improvement' to the previous mapping, using additional data and providing finer spatial resolution. In accordance with the feedback from the LLFA, the Applicant's position is therefore that additional modelling of flood risk with the RoFSW mapping is not necessary, as the Site is outside of the fluvial flood risk area from the Lostrigg Beck in present day and future climate change scenarios. As described in EA16, the Applicant's understanding of the position has not changed following the receipt of the updated mapping in March 2025.</p> <p>There are no main rivers within the Site, with the nearest being the Lostrigg Beck to the east of the Site opposite the public highway (Branthwaite Edge Road) that forms the Site's eastern boundary.</p> <p>The Applicant and the EA agreed the scope for further hydraulic analysis. This analysis has generated rating curves and detailed flood extents based on EA-advised precautionary flood flows and utilising the most precautionary 2080s epoch flows (on the basis that delays could push the operational and /decommissioning phase into the start of this epoch).—</p> <p>The results of this analysis are consistent with the EA Risk of Flooding from Surface Water (RoFSW) mapping which are also utilised to assess fluvial flood risk within the FRA and ODS. The work will be formalised into a Technical Note, and incorporated into a new Appendix of an updated issue of the</p>	<p>consideration. The Applicant and the EA agreed on the scope for further hydraulic analysis which is currently under review as of 14-08-2025</p> <p>The matter stands as under discussion until the EA has finished its review and is satisfied that the hydraulic analysis is consistent with the EA Risk of Flooding from Surface Water (RoFSW) mapping which are also utilised to assess fluvial flood risk within the FRA and ODS.</p>	098

Ref	Topic	Applicant Position	EA Position	Application Ref
		FRA.		
EA12	Approach to the Pluvial (surface water) flood risk	The Site is generally at low risk of surface water flooding other than along watercourses and in natural topographic depressions. The Proposed Development is of a nature that is not vulnerable to flood risk and will not increase flood risk elsewhere following the implementation of the targeted sustainable drainage strategy as set out in the FRA and ODS. The principles of the ODS are agreed with the LLFA and Natural England, and it is not considered that additional pluvial flood risk modelling will be necessary because this topic can be addressed through good design.	The Applicant has undertaken further hydraulic analysis. They submitted a Hydraulic Analysis on 14-08-2025 which the Environment Agency (EA) is currently reviewing. If satisfactory it will be incorporated into the FRA. The matter stands as under discussion until the EA has concluded a review of the hydraulic analysis and is satisfied that further pluvial flood risk modelling will not be necessary.	ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy [AS-013] (section 5 and section 8 (ODS))
EA13EA16	Design / layout in relation to flood risk	<p>The position on flood risk and drainage is set out effectively in the FRA and ODS. This includes insight into aspects of mitigation which are embedded in solar farm technology and the Proposed Development's parameters, as secured in the Design Parameters Document (DPD). <u>It is agreed that the solar panels have sufficient freeboard above flood levels, subject to the further clarification, which is to be provided within the ODS, which the EA will be consulted on prior to submission at D4.</u></p> <p>It <u>is agreed in principle</u> that the ODS also includes a <u>suitable</u> commitment to a sequential approach being taken for the layout of equipment within the Site which avoids placing more sensitive elements of Work No. 1 (e.g. PCS units) <u>and Work</u></p>	<p>The matter stands as under discussion until the EA has concluded a review of the hydraulic analysis submitted on 14-08-2025 and confirms there is no flood risk</p> <p><u>The EA is in agreement in principle with the applicant's approach further to our meeting on 23 September 2025 and awaits updated documents to review at DL4 and seek</u></p>	ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy FRA & ODS [REP2-022AS-013] Design Parameters Document DPD [APP-028] Works Plans [APP-007] ES Fig 7.6 Landscape Strategy Plan LSP

Ref	Topic	Applicant Position	EA Position	Application Ref
		<p><u>No.2 in</u> limited areas of med-high pluvial risk, and the use of targeted SuDS measures for any elements capable of representing new hardstanding. <u>It is agreed that Applicant will update the OCEMP and ODS to make it clear that the sequential siting of infrastructure within the final design will consider the baseline provided by the FRA and Appendix D – hydraulic analysis, and any additional available flood risk information, to be submitted at D4.</u></p> <p>The ODS utilises SuDS and natural 'rural' drainage features where possible and aims to maintain greenfield runoff characteristics, minimise impacts on the existing blue infrastructure network, and utilise landscaping to provide the majority of SuDS services and betterment. This will largely be achieved by ensuring effective vegetated ground cover across the Site and the retention of existing and new boundary vegetation.</p> <p>This approach reflects established best practices on large scale solar farms which is backed by research which is referenced in the FRA and has been agreed with the LLFA and Natural England. It is considered that this will be a suitable foundation for the final DS which will be subject to LLFA pre-application consultation and approved as a DCO Requirement.</p> <p><u>The Applicant does not intend for upgrade works to be undertaken to the existing culvert over the Lostrigg Beck which coincides with the highway (Branthwaite Edge Road) which is where the Lostrigg Beck becomes a main river under the purview of an EA. As set out in EA4, the Applicant intends to make use of the many existing culverted crossings across the Site, with works to be limited to any upgrades /</u></p>	<u>agreement at DL5.</u>	<p>[APP-088]</p> <p>ES Appx 7.7 Outline Landscape Ecological Management Plan OLEMP [APP-145]</p> <p>Draft Development Consent Order DCO [APP-012]</p>

Ref	Topic	Applicant Position	EA Position	Application Ref
		<p><u>reinforcements that may be necessary. It is agreed that the language of the OCEMP section 12, which deals with the Applicant's approach to works actually/potentially affecting flows through a water channel via the OWC process, will be updated to confirm the expectation that the OWC application will be required to demonstrate the impact of any design on flow rates, either resulting in no change or no change that alters the outcomes of the Appendix D hydraulic analysis.</u></p> <p><u>The Applicant and the EA have agreed on updates to the OCEMP and ODS which would address the points raised by the EA in relation to solar panel freeboard, sequential siting of infrastructure, and crossings and conveyance. It is understood that the details of this matter remain under discussion at D3 until the EA have reviewed the final wording of the updated OCEMP and ODS, to be submitted at D4.</u></p>		
EA14	WFD Assessment of water quality impacts.	<p>The WFD Assessment concludes that the Proposed Development will not have any significant effects on the WFD water bodies and will not prevent future improvement to either the Lostrigg Beck and Lowca Beck WFD waterbodies. It further concludes that a positive impact on waterbodies is possible from reduced contamination from polluted surface runoff due to the reduced grazing, the use of SuDS, and the planting within Lostrigg Beck.</p> <p>The appropriate mitigation of water quality impacts (i.e. from materials management measures, pollution and contamination prevention, grazing management, and maintenance and monitoring of watercourses and habitat enhancements) are provided within the relevant outline control documents for the construction, operational, and</p>	The matter is under discussion subject to the EA's approval of the final design.	<p>ES Appx 2.3 Water Framework Directive Assessment [APP-098]</p> <p>Works Plans [APP-007]</p> <p>Design Parameters Document [APP-028]</p> <p>ES Appx 2.4 Flood Risk Assessment and Outline Drainage Strategy [AS-013]</p>

Ref	Topic	Applicant Position	EA Position	Application Ref
		decommissioning phases, as well as from the embedded measures such as watercourse buffers secured through the Works Plans, and infrastructure parameters, secured through the Design Parameters Document (DPD).		
EA15EA17	Impacts on <u>and mitigation of</u> the River Derwent and Bassenthwaite Lake Special Area of Conservation (SAC) and River Derwent and Tributaries SSSI	<p>The impact-pathways between the Site and the Derwent and Bassenthwaite Lake SAC have been appropriately considered within the Shadow Habitats Regulations Assessment (sHRA) in line with guidance/standards/feedback from Natural England and the EA.</p> <p>Within the sHRA Likely Significant Effects (LSE) could not be ruled out during construction for the River Derwent and Bassenthwaite Lake SAC given the presence of hydrological connectivity between the Site and SAC. As such, this European Site was taken forward for Appropriate Assessment.</p> <p>It is agreed that the application's SHRA methodology is appropriate and has considered the potential impacts arising from the Proposed Development on the SAC's populations of Atlantic salmon and other qualifying species.</p> <p><u>The sHRA has further considered the potential for in-combination effects with Lostrigg Solar (now withdrawn as a DCO but potentially coming forward under TCPA) and concluded that there will be no likely in-combination significant effects.</u></p> <p><u>The Applicant has considered the potential impacts on fish populations downstream of the Site, which are not designated features of the SHRA. While the Applicant considers in-stream works to be unlikely, as existing farm tracks and</u></p>	<p>The Applicant is awaiting a response from the EA on this issue<u>EA agree in principle further to our discussion with your ecology specialist on 23 September 2025. However, we would require clarification that mitigation is in place. Agreement is subject to review of the CEMP update.</u></p>	<p>ES Appx 8.7 - Shadow <u>Habitat Regulations Assessment</u> <u>SHRA</u> <u>[APP-156]</u></p> <p>ES Appx 2.3 WFD Assessment <u>[APP-098]</u></p> <p>ES Ch8 - Biodiversity <u>[APP-038]</u></p> <p>ES Appx 5.1 OCEMP <u>[APP-108]</u></p> <p>ES Appx 7.7 OLEMP <u>[APP-145]</u></p>

Ref	Topic	Applicant Position	EA Position	Application Ref
		<p><u>established access points are intended to be used, provision has been made within the OCEMP for the potential for the construction of a crossing point. It is agreed that, subject to the EA's review of the updated OCEMP to be submitted at D4, which will include reference to a Method Statement for any damming or over-pumping to protect fish downstream of the Site, the appropriate safeguards to protect the aquatic environment have been included within the OCEMP.</u></p> <p><u>Mitigation is embedded within the design through the work plans and control documents (OCEMP, OSMP, OOMP, OLEMP, ODS, FDMP) which reflect standard best practice and compliance with health and safety and environmental legislation for topics such as pollution prevention, waste management, and habitat protections. On this basis the Proposed Development will not have an adverse effect on the integrity of the River Derwent and Bassenthwaite Lake SAC. As part of the Proposed Development, bankside habitats will be improved by riparian planting; buffers will be established between watercourses and infrastructure; and sheep will be excluded from the riparian corridor to prevent poaching and browsing as well to improve water quality. Such protections will also be carried through during operation, as set out in the OLEMP which includes protection of watercourses by riparian planting and a reduction in grazing pressure via the OGMP.</u></p>		
EA16	Cumulative impacts on the River Derwent and Bassenthwaite Lake Special Area of Conservation (SAC)	<p>The impact pathways between the Site and the Derwent and Bassenthwaite Lake SAC have been appropriately considered within the Shadow Habitats Regulations Assessment (sHRA) in line with guidance/standards/feedback from Natural England and the EA.</p>	<p>Whilst the EA acknowledges that Lostrigg Solar has been withdrawn as a DCO, the matter is still under discussion until there is certainty that there will</p>	<p>ES Appx 2.3 Water Framework Directive Assessment [APP-098]</p> <p>ES Appx 8.7—Shadow</p>

Ref	Topic	Applicant Position	EA Position	Application Ref
	and River Derwent and Tributaries SSSI	The SHRA has further considered the potential for in-combination effects with Lostrigg Solar (now withdrawn as a DCO but potentially coming forward under TCPA) and concluded that there will be no likely in-combination significant effects.	not be any potential for in-combination effects as Lostrigg Solar comes forward under TCPA. Further discussion with the Applicant and possibly the relevant local planning authority will provide clarity on the status on Lostrigg Solar.	Habitat Regulations Assessment [APP-156] ES Ch8 Biodiversity [APP-038]
EA17	Mitigation of impacts on the River Derwent and Bassenthwaite Lake SAC and River Derwent and Tributaries SSSI	Mitigation is embedded within the design through the work plans and control documents (OCEMP, OSMP, OOMP, OLEMP, ODS, FDMP) which reflect standard best practice and compliance with health and safety and environmental legislation for topics such as pollution prevention, waste management, and habitat protections. On this basis the Proposed Development will not have an adverse effect on the integrity of the River Derwent and Bassenthwaite Lake SAC.	This matter is left as under discussion. The EA is currently reviewing the listed documents against the DCO Requirements and will provide a distinct response after review.	ES Appx 2.3 Water Framework Directive Assessment [APP-098] ES Appx 8.7 Shadow Habitat Regulations Assessment [APP-156] ES Ch8 Biodiversity [APP-038] ES
EA18	Potential impact pathways on fish	It is anticipated to be agreed that ES Ch8 Biodiversity and the SHRA have appropriately assessed the potential effects to fish. As part of the Proposed Development, bankside habitats will be improved by riparian planting; the establishment of buffers between watercourses and infrastructure; the exclusion of sheep from the riparian corridor to prevent poaching and browsing as well as improve water quality. Such protections	The Applicant is awaiting a further response from the EA on this matter	ES Ch8 Biodiversity [APP-038] ES Appx 8.1 PEA and GCN Report [APP-150] ES Appx 8.7 Shadow Habitat Regulations Assessment [APP-

Ref	Topic	Applicant Position	EA Position	Application Ref
		<p>will also be carried through during operation as set out in the OLEMP which includes protection of watercourses by riparian planting and a reduction in grazing pressure via a GMP.</p> <p>It is agreed that the buffers to watercourses and protections set out within the OCEMP mean that fish are not required to be included within the PEA, and that safeguards to protect the aquatic environment have been included within the OCEMP, such as the erection of barriers to prevent incursions into the 8m buffers to watercourses.</p> <p>A full response on this matter is provided within the ARRR [REP1-002].</p>		<p>156]</p> <p>Es Appx 5.1 Outline Construction Environmental Management Plan [APP-108]</p> <p>ES Appx 7.7 Outline Landscape Ecological Management Plan [APP-145]</p>
EA19	Management of contamination and pollution during construction, operation, and decommissioning	<p>It is anticipated to be agreed that the OCEMP and OSMP provide the basis of a comprehensive set of construction management measures that directly relate to water quality effects, including general housekeeping (how/where things are sited), pollution prevention (including dirt/dust and contamination incidents), waste management, the use of barriers such as silt fencing, and other measures which have knock-ons for water quality such as the restriction of works depending on soil wetness conditions.</p> <p>It is anticipated to be agreed that, during operation, the Proposed Development will only have a minimal risk of pollution, and proposed natural drainage and swales, vegetated buffer strips and marginal planting, and management of limited conservation grazing has the potential to improve water quality at the River Marron and benefit riparian plant species, birds, and aquatic species including European eel and brown trout. Habitats and planting on Site will be managed in accordance with a LEMP which will</p>	The Applicant is awaiting a further response from the EA on this matter.	<p>ES Appx 5.1 Outline Construction Environmental Management Plan [APP-108]</p> <p>ES Appx 7.7 Outline Landscape Ecological Management Plan [APP-145]</p> <p>ES Appx 3.1 Outline Operational Management Plan [APP-107]</p> <p>ES Appx 5.3 Outline Soil Management Plan [APP-110]</p> <p>ES Appx 5.4</p>

Ref	Topic	Applicant Position	EA Position	Application Ref
		<p>include surveys and monitoring and ensuring that non-native species do not become established. The GMP further has the objective of preventing overgrazing and agricultural runoff into watercourses.</p> <p>It is anticipated to be agreed that, during decommissioning, the FDMP provides a suitable framework to secure the appropriate pollution and contamination prevention measures, which will be set out within a Decommissioning Environmental Management Plan (DEMP) in line with the principles established by the OCEMP and best practice at the time of decommissioning.</p>		<p>Framework Decommissioning Management Plan [APP-111]</p>
EA18	Management of unexpected contamination	<p>It is anticipated to be agreed that the Applicant has secured the appropriate approach to managing unexpected contamination through the OCEMP, which has been updated to provide additional clarification in response to the EA's RR <u>and will be submitted at D4, subject to the EA's review and confirmation of the final wording.</u> Further detail is provided in the ARRR [REP1-002]. <u>The updated text has also been provided to the Council's Environmental Health Officer (EHO) for their agreement.</u></p>	<p>The EA have proposed wording for the OCEMP in relation to stopping work in the area of contaminated land which is being considered by the Applicant.</p> <p><u>The EA would want to be named as a consultee on unsuspected contamination. The EA are in agreement with the proposed wording in the OCEMP but would like to be a named consultee in the DCO requirement for any form of unsuspected contamination.</u></p>	<p>ES Appx 5.1 <u>Outline Construction Environmental Management Plan</u>OCEMP [APP-108]</p>

2.4 Matters not agreed

- 2.4.1 The Applicant and the EA do not currently consider that there are any matters which have not been agreed, that are not capable of being resolved throughout Examination.

3 Record of Engagement

3.1 Summary of consultation and engagement

3.1.1 The table below summarises communication in relation to progressing this dSoCG.

Table 3.1 Summary of consultation and engagement with the EA

Ref	Date	Form of correspondence	Key topics discussed and key outcomes
EA.A	05.09.2023	Input to Scoping Opinion (ES Appendix 2.2 [APP-097])	The EA broadly agreed on the topics scoped in and out of the EIA
			Groundwater - The EA agree with the topics scoped out of the EIA in relation to groundwater
			Water resources and flood risk - the EA agreed on scoping out an ES chapter on water resources, hydrology, and flood risk from the ES and recommended that pollution prevention is taken into account during construction, operation, and decommissioning, and advised inquiring into private water suppliers in the vicinity of the Proposed Development.
			Ground conditions - the EA agreed with the proposed approach in relation to land contamination and to undertaking a ground investigation.
			Drainage - The EA raised that the drainage strategy should include measures to prevent pollution in line with guidance
			Information about environmental permits - the EA advised that if dewatering is required, an environmental permit may be necessary and pointed to the relevant guidance.
			Information about waste on site - the EA highlighted the appropriate guidance on excavated materials.
			Waste - the EA advised that contaminated materials should be adequately characterised and disposed of in line with British Standard Regulations.

Ref	Date	Form of correspondence	Key topics discussed and key outcomes
			Flood risk - the EA welcomed an 8m buffer around all watercourses and advised engagement with the LLFA on the potential impacts on the hydrology of Ordinary Watercourses.
			Water quality - the EA recommended consideration of measures to improve the ecology and chemistry of waterbodies on Site and advised on deep infiltration systems.
			Biodiversity - the EA recommended the creation of riparian buffer zones, advised on avoiding ecological impacts on European eel within the Lostrigg Beck which is a European eel and Brown Trout River, and advised on avoiding impacts on the CWS.
EA.B	21.11.2023	Meeting (ES Appendix 2.4 FRA Appendix C Stakeholder Correspondence [AS-013])	The Applicant met with the EA to discuss engagement going forwards and briefly the approach to flood risk modelling
EA.C	12.04.2024	Statutory consultation response (summarised in Table 1.1 of the FRA and ODS [AS-013])	The EA were satisfied with the scope of the PEIR
			Flood risk - The EA raised that the flood risk is not fully understood because fluvial flood risk is not mapped for catchments under 3km ² where the Lostrigg Beck converges with the ordinary watercourse.
			The EA raised comments in relation to vegetation planting within watercourses and minimising impacts on eel and brown trout
			The EA commented on the mitigation of water quality impacts within the OCEMP, ensuring compliance with the OCEMP, and pollution prevention / control.
			The EA raised comments in relation to ES Chapter 8 Biodiversity and the ecological enhancements in relation to the CWS and across the Site

Ref	Date	Form of correspondence	Key topics discussed and key outcomes
			<p>The EA commented on repeat surveys and, the control of invasive species, and the potential for creation of wetland habitats.</p> <p>The EA highlighted the potential need for a Foundation Works Risk Assessment</p> <p>The EA provided information on permits and consents</p>
EA.D	17.01.2025	Email	Applicant shared minute of meeting with the LLFA to discuss flood risk
EA.E	30.01.2025	Email	The EA agreed that the flood risk from Lostrigg Beck is low and not a concern
EA.F	30.01.2025	Email	EA highlighted potential flood risk from ordinary watercourse and requested an assessment of fluvial flood risk with consideration of the 1 in 100-year plus climate change flood event particularly for the ordinary watercourse.
EA.G	05.02.2025	Email	The Applicant responded to summarise the agreement on the baseline flood risk data with the LLFA, and that the EA Risk of Flooding from Surface Water maps were suitable. The Applicant considers that the parameter plan has been developed with consideration of flow routes, and that given the steep topography, it is not likely that climate change would significantly affect flood risk.
EA.H	17.02.2025	Email	The EA provided a response, summarising the need to undertake flood risk modelling of the ordinary watercourse
EA.I	18.03.2025	Email	The Applicant shared the Potential Main Issues for Examination which included the EA's comments about flood risk modelling.
EA.J	14.04.2025	Email	Applicant and the EA met to discuss the EA's comments regarding Lostrigg Solar DCO and possible cumulative impacts.

Ref	Date	Form of correspondence	Key topics discussed and key outcomes
EA.K	22.04.2025, 25.04.2025	Email	Applicant clarified that only minor amendments were necessary after further updates to the EA's flood risk mapping service. The EA Confirmed the minute 25.04.25.
EA.L	15.07.2025	Meeting	Meeting to discuss the SoCG and Relevant Rep.
EA.M	21.07.2025	Email	The Applicant wrote to the EA to propose the scope of the hydraulic analysis to inform the flood risk assessment.
EA.N	21.07.2025- 22.07.2025	Email	21.07 The Applicant shared the methodology for the hydraulic analysis. 22.07 The EA provided comments from the scope and confirmed the methodology.
EA.O	14.08.2025	Email	The Applicant shared the results of the hydraulic analysis for EA review.
EA.P	11.09.2025	Email	The EA shared comments on the hydraulic analysis and the outstanding matters within the dSoCG, confirming that the matters which can be considered as 'agreed' as a result of the additional analysis.
EA.Q	16.09.2025	Email	The EA shared additional comments on the dSoCG in relation to water quality, confirming that this matter is agreed, and made further recommendations for content within the CEMP.
EA.R	23.09.2025	Meeting	The EA and the Applicant met to discuss the outstanding matters within the dSoCG and agreed on actions to resolve these matters through updates to the OCEMP and ODS to be submitted at D4. The updated position on these matters is reflected within Table 2.2 of this dSoCG.
EA.S	25.09.2025	Meeting	Follow up meeting to confirm how the outcomes of the discussions will be captured within the dSoCG.

4 Signatures

4.1.1 This Statement of Common Ground is agreed upon:

On behalf of the Environment Agency

Name:

Signature:

Date:

On behalf of the Applicant:

Name:

Signature:

Date:

